Citywide Housing Element 2021-2029 and Safety Element Updates

Final Environmental Impact Report

prepared by

City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012

prepared with the assistance of

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250 East 1st Street, Suite 1400
Los Angeles, California 90012

October 2021

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Environmental Scientists | Planners | Engineers
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1 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared by the Los Angeles Department of City Planning (DCP) for the "Proposed Project," which includes the Los Angeles Citywide Housing Element 2021-2029 Update and Rezone Program (hereafter referred to as "Housing Element Update"), the 2021 Safety Element Update and targeted amendments to the Plan for a Healthy Los Angeles (hereafter referred to as the "Safety Element Update"). This Final EIR complies with the requirements of the California Environmental Quality Act (CEQA) statutes (Cal. Pub. Res. Code, Section 21000 et. seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.) (the "CEQA Guidelines").

1.1 CEQA REQUIREMENTS

Before approving a project that may cause a significant environmental impact, CEQA requires the lead agency to prepare and certify a Final EIR. The City of Los Angeles has the principal responsibility for approval of the proposed project and is therefore the lead agency under CEQA Section 21067. According to the CEQA Guidelines, Section 15132, the Final EIR shall consist of:

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

While the Final EIR, under the CEQA Guidelines includes the Draft EIR, for purposes of clarity, the term "Final EIR" in this document will refer to everything contained in this document (as described in Section 1.3, below) and not the Draft EIR. "EIR" will refer both to the Final EIR and the Draft EIR.

1.2 PUBLIC REVIEW PROCESS

At the outset of the environmental review process, the DCP prepared a Notice of Preparation (NOP) for the Proposed Project (State Clearinghouse No. 2021010130). The NOP was published and distributed to the State Clearinghouse, trustee agencies, responsible agencies, and other interested parties for a 30-day public review period from January 13, 2021 to February 15, 2021. Two public scoping meetings were held: one on January 26, 2021 and one on January 28, 2021. The Draft EIR was circulated for a 45-day public review period from July 22, 2021 to September 7, 2021.

1.3 CONTENTS AND ORGANIZATION OF THE FINAL EIR

The Final EIR summarizes the project information presented in the Draft EIR and contains responses to comments on environmental issues received from agencies, organizations, and individuals who reviewed the Draft EIR. The Final EIR consists of the following five chapters:

- **Chapter 1 – Introduction.** This chapter summarizes the contents of the Final EIR and the environmental review process.
- **Chapter 2 – Supplemental Analysis Related to Modifications to the Housing and Safety Element Updates and New Information.** This chapter provides supplemental analysis related to modifications and technical refinements to the Proposed Project and new information and discusses whether the changes and new information could result in new or more severe significant impacts than those identified in the Draft EIR.
- **Chapter 3 – Responses to Comments.** During the public review period for the Draft EIR, the City received 82 written comment letters pertaining to the Draft EIR. This chapter contains a summary of these comment letters and the City's responses to those comments that raise significant environmental points. A list of individuals, organizations, and public agencies commenting on the Draft EIR is provided.
- **Chapter 4 – Corrections and Additions.** This chapter provides a list of changes that were made to the Draft EIR. These revisions are shown in strikeout and underline text in this chapter.
- **Chapter 5 – Mitigation Monitoring Program (MMP).** This section of the Final EIR provides the MMP for the proposed project. The MMP is presented in tabular format and identifies mitigation measures for the proposed project, the implementation period for each measure, the monitoring period for each measure, and the enforcing agency. The MMP also provides a section for recordation of mitigation reporting.

The Final EIR also includes the following appendices:

- **Appendix I** – *Updated* Draft Housing Element Update (October 2021)
- **Appendix J** – *Updated* Draft Safety Element Update (October 2021)
- **Appendix K** – Listing of Amendments to the Plan for a Healthy Los Angeles (October 2021)
- **Appendix L** – Bracketed Public Comments Received for the Draft EIR
- **Appendix M –** Center for Biological Diversity References (Comment Letter O-9)

2 SUPPLEMENTAL ANALYSIS RELATED TO MODIFICATIONS TO THE HOUSING ELEMENT AND SAFETY ELEMENT UPDATES AND NEW INFORMATION

As a result of comments received on the Draft Environmental Impact Report (EIR), through the Proposed Project's public review and public hearing process, and through the Proposed Project's review by state and local agencies responsible for certifying the plan updates (including the California Department of Housing and Community Development (HCD) and CAL FIRE), changes to the Proposed Project have been made since the Draft EIR was circulated. As discussed in this Section, the changes to the Proposed Project are found to have been analyzed in the Final EIR and this Modification Section clarifies or makes minor modifications to the analysis contained in this Final EIR and does not result in significant new information under California Environmental Quality Act (CEQA) Guidelines Section 15088.5 as a result of causing a new significant impact or a substantial increase in the severity of an environmental impact. Although this Modification Section does not constitute significant new information per CEQA, the modifications and refinements remain subject to final adoption by the City Council and Mayor, similar to the other components of the Proposed Project.

In addition, this Modification Section includes a discussion of the 2020 Decennial Census population results, which were released on August 12, 2021 following the publication of the Draft EIR, and the State adoption of Senate Bills 9 (SB 9) and 10 (SB 10) in September of 2021.

As described in the Draft EIR, the Proposed Project includes the Los Angeles Citywide Housing Element 2021-2029 Update and rezoning Program ("Housing Element Update") and 2021 Safety Element Update and targeted updates to the Plan for a Healthy Los Angeles ("Safety Element Update"). For ease of review, the modifications to the Housing Element Update and the Safety Element Update are summarized in this chapter, as follows.

2.1 MODIFICATIONS AND REFINEMENTS TO THE HOUSING ELEMENT UPDATE

Many comments on the Draft Housing Element Update were received during and after the Draft EIR public comment period. Additionally, on September 3, 2021, the City received comments on the draft plan from HCD. A comprehensive updated Draft Housing Element Update was released on September 15, 2021 which included modifications to respond to HCD comments and ensure compliance with state Housing Element requirements. Additional public input from stakeholders and members of the public

was received. The October 2021 version was released as CPC-2020-1365-GPA; CPC-2021-5499-GPA Staff Report Exhibit (Exhibit B) for the City Planning Commission (CPC) meeting on October 14, 2021.

The Draft Housing Element Update included with the Final EIR replaces the July 2021 version released with the Draft EIR and is referenced as Appendix I in this Final EIR. It incorporates the October 14, 2021 recommendations of the City Planning Commission (CPC), including technical modifications. Changes to the policy document include, but are not limited to, the changes summarized herein.

Inventory of Adequate Sites for Housing

The Inventory of Adequate Sites for Housing in Chapter 4 and associated Appendices were revised to address comments from HCD and comply with the requirements in state law, as well as to reflect the most current information regarding individual components of the Inventory. This includes the following revisions:

- Revised Appendix 4.2 and Appendix 4.3 (pipeline development through private and publicly-funded development projects) to reflect current pipeline development anticipated to be completed during the planning period;
- Revised assumptions regarding pipeline development completion rates, based on detailed review of historical data trends;
- Revised Appendix 4.1 (vacant and non-vacant sites analysis) to remove sites with expected pipeline development potential, so as to eliminate duplication;
- Revised Accessory Dwelling Unit (ADU) estimates to be consistent with data previously reported to HCD;
- Revised assumptions regarding additional, non-site specific development potential associated with public programs such as Project Homekey and the City's public land development efforts; and
- Added a new Appendix 4.8 listing potential City-owned sites that could be considered for the Public Land Program.

As a result of these revisions, the overall anticipated development potential identified in the Draft Housing Element was adjusted, reflecting a total development potential of 230,947 units, of which 72,640 are lower income.[1] Table 2-1 provides a summary of the revised Adequate Sites for Housing, by Income Category.

[1] The Draft EIR anticipated an overall development potential of 266,647 units, of which 81,312 are lower income.

Table 2-1 Summary of Adequate Sites for Housing, by Income Category

Component	Lower Income Units	Moderate Income Units	Above Moderate Income Units	Total Units
Vacant and Underutilized Sites				
Expected Unit Potential	16,955	5,039	20,770	42,764
Warner Center 2035 Specific Plan	0	0	10,491	10,491
Planned and Approved Projects (Development Pipeline)				
Public Land	5,606	12	2,273	7,891
Private Development Projects	18,987	**1,352**	97,475	117,814
Additional Means of Meeting the RHNA - Non-Site-Specific				
ADU Development	24,592	2,459	13,935	40,987
Project Homekey Expansion	1,000	0	0	1,000
Public Land Programs	5,500	4,500	0	10,000
Total Development Potential	**72,640**	**13,362**	**144,944**	**230,947**

As discussed in the Draft EIR, the Sites Inventory may account for pipeline housing development projects that have not yet been completed during this planning cycle. These include pending, approved or permitted housing development projects that are expected to receive a Certificate of Occupancy (COO) after the beginning of the 2021-2029 planning period. As previously described, the revised Housing Element Update estimates that 117,814 pending, approved or permitted housing development projects are expected to receive a COO after the beginning of the 2021-2029 planning period and therefore count towards the 6th cycle RHNA need. Of these, approximately 80,792 have already received approval by the City.[2] The revised anticipated pipeline development is summarized in Table 2-2.

[2] The Draft EIR estimated that 144,040 pending, approved, or permitted housing units were expected to count towards the RHNA need. Of these, 36,316 had already received approval by the City and therefore were not analyzed in the Draft EIR, except under a cumulative impact analysis. As noted in the Draft EIR, since the time of the preparation of the EIR, the estimated number of housing units expected to count towards completion of the RHNA had increased; however, the analysis relies on the lower number of approved housing units that was initially included in the Notice of Preparation. This results in a more conservative analysis of potential environmental impacts for the purposes of CEQA.

Table 2-2 City of Los Angeles Pipeline Housing Units Expected to Receive Certificate of Occupancy (COO) During Sixth Cycle

Project Type	Net Units Added	% Units Expected to Reach COO	Units Expected to Reach COO
Active Planning Entitlements	40,662	64%	26,025
Approved Planning Entitlements with No Building Permit	84,725	70%	59,309
By-Right Building Permit Applications (Permit not Issued)	11,575	95%	10,997
Approved Building Permits with No COO (Since April 2020)	22,145	97%	21,483
Total	**159,107**		**117,814**

The Housing Element is required to include rigorous analysis that demonstrates not only available zoned capacity, but also the likelihood of housing development under existing zoned conditions. Due to these state legal requirements, the City is unable to demonstrate adequate capacity to accommodate the RHNA, and therefore must pursue a Rezoning Program to accommodate the shortfall.

As a result of these revisions, the total identified rezoning need in the Housing Element Update is 255,432 units, including 130,553 lower-income units, 72,993 moderate income units, and 51,887 above moderate-income units.[3] As discussed in the Draft EIR and the Housing Element Update, the rezoning need is required to accommodate the build out of the City's RHNA Allocation during the planning period.

Rezoning Program and Inventory of Candidate Sites for Rezoning

The policy document includes revisions to Chapter 4 to provide a more detailed description of the proposed Rezoning Program (Program 121) previously included in the July 2021 draft Housing Element Update and described in the Draft EIR. In addition, the revised Housing Element Update includes a new Appendix 4.7 (Candidate Sites for Rezoning), which identifies potential sites for future rezoning, along with state-required information on each of the properties, including the realistic number of housing units that can be accommodated on each site as a result of the various rezoning strategies. Sites were selected based on the criteria included in the Rezoning Program description. Sites will not be rezoned as part of the Proposed Project, but rather are identified for further refinement and consideration as part of the implementation of the Rezoning Program prior to the October 2024 adoption deadline.

[3] The rezoning need identified in the Draft EIR was 219,732 units, including rezoning to accommodate a shortfall of 121,881 lower income units, 72,639 moderate income units, and 25,212 above moderate-income units.

A total of at least 243,254 potential sites containing 1,432,059 units are identified as part of the Rezoning Program. Of these, at least 36,446 sites containing 591,726 units have been identified as meeting the state law criteria as lower-income, meaning they can accommodate at least 16 units per site and can include minimum densities of at least 20 units/acre. The Inventory of Candidate Sites for Rezoning lists many more sites and potential units than are necessary to satisfy the RHNA requirements. This expansive approach is purposeful to allow the flexibility for future refinement of the rezoning strategies and sites. As such, sites included on the list should be considered as potential sites for rezoning consideration, not a final list of sites that will be rezoned. Other sites may be added, and listed sites may be removed or amended. A public review process will help guide future recommendations as to which sites are rezoned at which densities, but should follow the Housing Element's objective of an equitable rezoning program that furthers fair housing goals.

While the revised draft provides additional information on the individual strategies encompassed under the Rezoning Program, and includes a list of potential candidate sites, this information is consistent with the description the Rezoning Program provided in the Draft EIR, in particular with regard to geographic focus and types of strategies. As the analysis in Chapter 4 shows, the Rezoning Program identifies opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, and in higher resource areas. The Rezoning Program includes a number of possible strategies that prioritize rezoning in these areas, including:

- Updates to the City's Community Plans;
- An update to the City's affordable housing incentive programs (including Density Bonus and Transit Oriented Communities);
- Targeted zone changes;
- Updates to specific plans and overlays;
- Programs to create opportunities for missing middle housing typologies; and
- Other zoning ordinances or amendments.

Additionally, the description of the Rezoning Program (Program 121) in the draft Housing Element Update includes a statement that it will ensure protections for areas prone to wildfire risk, and no sites located in a VHFHSZ are listed on the Inventory of Candidate Sites for Rezoning (Appendix 4.7).

Affirmatively Furthering Fair Housing Analysis

The document was revised to include a comprehensive Affirmatively Furthering Fair Housing analysis, consistent with state requirements. Chapter 1 introduces and summarizes the concept of

AFFH, and provides a summary of the detailed analysis. Appendix 1.1 provides an extensive assessment of fair housing practices, including a summary of fair housing issues in Los Angeles, an analysis of patterns, trends, and disproportionate housing needs as well as a list of contributing factors to fair housing issues based on the analysis. This analysis is connected to a list of concrete actions in the form of programs to affirmatively further fair housing in Program 124 of Chapter 6. The City currently has a Federally adopted Assessment of Fair Housing Plan (2018-2023) that informed the analysis.

Additionally, the document includes refinements to Chapter 4 and Appendix 4.4 to provide additional AFFH analysis of the Inventory of Adequate Sites for Housing and the Candidate Sites for Rezoning. This includes additional analysis of the location and distribution of sites with regard to: transportation access, displacement vulnerability, Racially/Ethnically Concentrated Areas of Poverty, and Racially Concentrated Areas of Affluence.

Goals, Objectives, Policies, and Programs

To further address the comments received, revisions were also made to Chapter 6 to provide more detail and clarification around the goals, objectives, policies and programs previously included in the July 2021 draft Housing Element Update and described in the Draft EIR.

One new policy was added to the draft to reflect the importance of supporting areas of the city that have historically faced disinvestment and predatory financial practices. The new policy 4.3.4 reads: "Advance place based strategies that create opportunities and financial strength in areas of disinvestment and with a history of predatory financial practices through asset-building shared equity homeownership that creates stability and mitigates displacement pressures through community control." This policy is reflective of existing General Plan policy language found in other elements such as the Framework Element and Health Element (Plan for a Healthy Los Angeles). In addition, the City Planning Commission added a new policy to encourage convertible design of above ground parking structures in transit rich areas so they can later be converted to housing.

Additionally, many implementation programs were revised with minor details including clarification of program objectives, provision of a timeline for program completion, as well as clarity on which organizations and groups would carry out implementation of the programs. More detailed revisions were made to the following programs:

- Program 9 (AHSC - Affordable Housing and Sustainable Communities Program);

- Program 11 (Land Use and Building Code Policies to Support Aging in Place and Special Needs Housing);
- Program 16 (New Models for Affordable Housing);
- Program 21 (Innovative Parking / Mobility Strategies in Housing);
- Program 48 (Update Density Bonus and Other Affordable Housing Incentive Programs);
- Program 58 (Development and Design Standards);
- Program 65 (Targeting Growth in Community Plan Areas);
- Program 82 (Accommodations for Persons with Disabilities);
- Program 88 (Eviction Defense Program);
- Program 95 (Problem Solving Interventions);
- Program 121 (RHNA Rezoning);
- Program 124 (Affirmatively Furthering Fair Housing (AFFH)); and
- Program 131 (Livable Communities)

Additionally, the revised policy document includes some new implementation programs which were added in response to public comment. This includes:

- Program 103 (Missing Middle), which reflects existing strategies outlined in the Rezoning Program to assess and facilitate efforts to find alternative housing solutions for senior citizens. The program defines missing middle housing as a variety of low-scale multifamily housing typologies (typically from three to 20 units on a regular sized residential lot) and details that City Planning will seek to introduce more flexible zoning standards and incentives to create opportunities for more low-scale multi-unit housing typologies, particularly in Higher Opportunity Areas.
- Program 130 (Historic Housing and Land Use Study), which references a Historic Housing and Land Use Study that will be completed in 2021 and referenced in the RHNA rezoning program 121.

Other Refinements

In addition to the modifications previously described, the draft policy document includes additional refinements to respond to the initial HCD review and public comment. These refinements include, but are not limited to:

- Expanded analysis of certain housing needs (including persons with cognitive disabilities, extremely low income households, and lower income cost burdens) in Chapter 1;

- Refined quantified objectives in Chapter 1 related to moderate income new construction and lower income conservation/preservation based on state input;
- Provided additional information on certain governmental and nongovernmental constraints (including off site improvements, site plan review, local building codes, and land costs) in Chapter 2;
- Refined timelines and objectives for various implementation programs to provide more specificity on anticipated milestones, as applicable;
- Updated the summary of public comments received in the Executive Summary as well as Appendix 0.1, as well as a summary of how the comments were incorporated into the draft; and
- Technical document corrections including typographical corrections.

2.2 MODIFICATIONS AND REFINEMENTS TO THE SAFETY ELEMENT UPDATE

Many comments on the Draft Safety Element Update and amendments to the Plan for a Healthy Los Angeles were received during and after the Draft EIR public comment period, including comments from members of the public, other City Departments and CAL FIRE. A comprehensive updated Draft Safety Element was first released on July 7, 2021. This draft was submitted to State Agencies, including the California Board of Forestry and Fire Prevention (CAL FIRE), the California Office of Emergency Services, the California Geological Survey, California Department of Justice, and the Office of Planning and Research on July 15th, 2021. The Board of Forestry and Fire Prevention shared recommendations for revisions to the Safety Element at their board meeting on September 21, 2021. No other State Agencies responded to the draft. Relevant sections of the July Draft were shared with 43 Los Angeles City Departments, Agencies and Bureaus throughout the month of July. An updated draft, incorporating comments and recommendations received from the state, City Departments, and the public, was released on September 15, 2021. The October 2021 version was released as CPC-2020-1365-GPA; CPC-2021-5499-GPA Staff Report Exhibit (Exhibits G and J) for the City Planning Commission (CPC) meeting on October 14, 2021.

The Draft Safety Element Update included with the Final EIR replaces the July 2021 version released with the Draft EIR and is referenced as Appendix J in this Final EIR. The draft amendments to the Plan for a Healthy LA included as part of the Safety Element Update are referenced in Appendix K in this Final EIR. No significant changes were made to the Plan for a Healthy Los Angeles Amendments between the Draft and Final EIR. The appendices incorporate October 14, 2021 recommendations of the CPC, including technical modifications. Changes to the policy documents include, but are not limited to, the changes summarized herein.

Relationship to Other Planning Efforts

Language was added to further clarify the relationship between the Safety Element and the related planning efforts described throughout the document. The Local Hazard Mitigation Plan (LHMP), including related maps and exhibits, is formally integrated as a component of the Los Angeles General Plan Safety Element. Language was added to clarify that the LHMP Risk Assessment serves as the City's Vulnerability Assessment. Language was added to clarify that other adopted City plans, including the Floodplain Management Plan and Emergency Operations Plan, implement the Safety Element and provide more detailed information on specific Safety Element topics. Finally, Mayoral plans including the Green New Deal and Resilient Los Angeles are noted for providing background information and policy language that was used to shape policies and programs being adopted in the Safety Element.

Land Use Mitigations Specific to Very High Fire Hazard Severity Zones and other Hazard Areas

CAL FIRE recommended the City further clarify existing mitigations in Very High Fire Hazard Severity Zones (VHFHSZ). Updates were made to Chapter 2: Existing Conditions, Hazard Issues and Mitigation History to integrate these recommendations. This includes the addition of a map demonstrating General Plan Land Use in VHFHSZs and additional details on mitigations already adopted into the Los Angeles Building Code and Fire Code.

CAL FIRE also recommended revisions to Policy language, which have been integrated. Language was added to Policy 1.1.3 to encourage the location of critical facilities and infrastructure outside of hazard areas. Policy 1.1.6 was expanded to ensure that state and federal standards are regularly adopted into the Los Angeles Municipal Code, along with the addition of language encouraging existing non-conforming structures and evacuation routes to meet modern compliance standards. Policy 2.1.5 was expanded to capture the City's commitment to staff training and preparedness. Policy 2.1.6 was expanded to integrate specific fire management standards.

Additionally, CAL FIRE and the public expressed a desire to minimize development within VHFHSZs, and hazard areas more generally. Policy 1.1.8 was added to reflect the City's commitment to maintaining low density zoning designations in VHFHSZs and ensuring appropriate mitigations throughout hazard areas.

Programs Revisions

Revisions were made to programs to better reflect collective efforts from City Departments. Edits have been made to program text to accurately reflect the work programs of involved departments, with an emphasis on the work programs and planning efforts executed by the Department of Water and Power. Additions were made to several programs to reflect the City's efforts to retrofit and harden existing non-conforming structures, especially in the VHFHSZ. The City received several comments related to the risks associated with Oil and Gas production. Program 6: Identify, Analyze and Mitigate Local Oil and Gas Risk has been revised with additional details to address these comments. Two new programs, focused on Mobility and Mutual Aid, were added at the request of implementing departments to capture existing work programs. Additionally, the CPC added a new implementation program to the Health Element to review the General Plan and update as appropriate to address emerging Environmental Justice concerns.

Appendices

Three appendices have been added: a listing of responsible departments, a listing of related plans, and a summary of changes comparing the 1996 Element to the 2021 Update.

2.3 ENVIRONMENTAL IMPACTS OF MODIFICATIONS TO THE PROPOSED PROJECT

The modifications previously described do not result in a significant change to the Proposed Project that was analyzed in the Draft EIR. In large part, the modifications are included to address comments from state agencies, including HCD and CAL FIRE, in order to ensure consistency with requirements in state law. Other changes to policies, programs, and background analysis do not constitute a substantial change to the project that would result in new information or new environmental impacts. In some cases, the modifications would likely result in a reduction in the severity of the environmental impacts related to the Proposed Project, for example, the land use mitigations specific to VHFHSZs and other Hazard Areas added to the Safety Element as the project relates to wildfire impacts.

As discussed in the Draft EIR, the project takes a conservative approach by analyzing the reasonable "worst case" scenario of environmental impacts from future implementation of the 2021-2029 Housing Element, which is the full build-out of the City's RHNA allocation. The most significant potential impact under this approach is the potential construction and operation of 420,327 housing units (hereafter referred to as "build out of the RHNA" or "housing development accommodated by the Housing Element Update"), which represents the City's RHNA allocation of 456,643 units, less the

36,316 already approved pipeline housing units expected to receive a COO during the 6th cycle. The changes to the Inventory of Sites and the Rezoning Program, previously described, therefore, do not change the project analyzed in the Draft EIR. The changes made to the inventory of sites and rezoning program are made towards obtaining build out of the RHNA. Therefore, the modifications do not result in significant changes to these assumptions; therefore, they would not result in new significant impacts or an increase in the severity of an environmental impact.

The changes to the Proposed Project are therefore found to have been analyzed in the Final EIR, and do not result in significant new information under CEQA Guidelines Section 15088.5 as a result of causing a new significant impact or a substantial increase in the severity of an environmental impact.

2.4 POPULATION AND HOUSING- 2020 DECENNIAL CENSUS

As discussed in Section 4.11, *Population and Housing*, of the Draft EIR, the 2020 Decennial Census data was anticipated to be released after the Draft EIR was prepared. The early 2020 Census results were released on August 12, 2021. The Draft EIR was published on July 22, 2021 to commence the 45-day public comment period.

The August 12, 2021 Census publication shows the City population as 3,898,747. This is 24,594 persons (less than 1 percent) fewer than the baseline population estimate in the Draft EIR. The population of the City at baseline was identified as 3,923,341 in the following places in the Draft EIR:

- Page 4.11-3 (Population and Housing)
- Pages 4.13-1, 4.13-3, 4.13-18 (Recreation)
- Page 4.12-34 (Public Services -Police)

The baseline for the EIR, consistent with CEQA Guidelines Section 15125, was the date of publication of the NOP, or January 21, 2021. (Draft EIR at 4-14; 1-10)

Notwithstanding the differences in the numbers, the City finds that it is not necessary or appropriate to update the baseline population figure in the Draft EIR with the Census numbers released in August 2021 because, among other reasons discussed herein, the baseline population number in the Draft EIR for January 2021 was supported with substantial evidence, the Census data collected between April and October of 2020 was taken during an extraordinary once in a hundred-year pandemic and is not as likely to represent normal conditions, and population is a fluctuating condition and the City finds using the baseline figure in the Draft EIR is the most reasonable estimate which will provide the public and decisionmakers the most accurate and understandable picture practically possible of the project's

likely near-term and long-term impacts. Moreover, as discussed herein, even if the Draft EIR was updated with the Census numbers as the baseline population estimate in the Draft EIR, it would not result in a new significant impact or more severe significant impact than those impacts disclosed in the Draft EIR.

With respect to housing units, the 2020 Census has not yet released an update to the 2019 estimate of housing units based on the 2019 American Community Survey (ACS) 1-year estimates. The United States (U.S.) Census Bureau anticipates releasing additional 2020 Census demographic data (e.g., housing unit estimates), developed from the 2020 ACS 1-year data, by November 30, 2021. Although this data is not yet available, the U.S. Census Bureau has provided 2020 Census redistricting data as part of the Census Redistricting Data Program (RDP), which, as required by law, provides the 50 states, the District of Columbia, and Puerto Rico with population counts to use in their redrawing of congressional and state legisla-tive district boundaries—a process known as "redistricting."[4] According to the 2020 Census redistricting data, the City of Los Angeles contains a total of 1,496,453 housing units, of which 1,410,260 units (or approximately 94 percent) are occupied.[5] The U.S. Census Bureau considers the estimates associated with the Census RDP as fit for use. However, as discussed in Section 4.11, *Population and Housing*, the City's housing unit count at baseline was identified as 1,493,108 in 2019 based on the ACS 5-year average, which is a nominal difference of 3,345 housing units when compared to the 2020 Census redistricting data. As such, the City finds that it is not necessary or appropriate to update the baseline population figure in the Draft EIR with the Census RDP housing unit estimate.

CEQA REQUIREMENTS FOR ESTABLISHING BASELINE

It is the lead agency's responsibility to determine the appropriate baseline for analyzing impacts. CEQA Guidelines Section 15125(a) provides the general rule for baselines:

> An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which the Lead Agency determines whether an impact is significant. The description of the environmental setting will normally constitute the baseline conditions by which a Lead Agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project

[4] United States Census Bureau. 2021. 2020 Census Redistricting Data Files Press Kit. Accessed October 2021 at: https://www.census.gov/newsroom/press-kits/2021/2020-census-redistricting.html.

[5] United States Census Bureau. 2021. Occupancy Status. Accessed October 2021 at: https://data.census.gov/cedsci/table?q=Los%20Angeles%20city,%20California%20Housing&tid=DECENNIALPL2020.H1.

> and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.
>
> …
>
> (1) Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published . . . . Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence.

POPULATION AS RELEVANT TO EXISTING SETTING FOR IMPACT ANALYSIS IN DRAFT EIR

Population as representing the existing setting was used in three different impact sections—Population and Housing, Recreation, and Public Services. Additionally, population as the existing setting informed the modeling for Air Quality, GHG Emissions, and Utilities (electricity and gas).

The large majority of impact areas in the Draft EIR do not rely or consider population as part of the impact analysis. Specifically, for the following impacts areas, the existing setting is the description of the existing natural or man-made site conditions and impacts are analyzed considering how the forecasted future construction and development activities and site operations will change the existing natural or man-made site conditions: aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, tribal cultural resources, and wildfire.

Additionally, for air quality and GHG emissions, existing population is not used directly in the analysis. Air quality and GHG impacts are analyzed by using the California Emissions Estimator Module (CalEEMod), which considers air and GHG emissions impacts from the construction and operation of 420,327 housing units. The model does not include or allow population as an input variable. The CalEEMod does include, among other inputs, existing and forecasted vehicle trips (VT) and vehicle miles traveled (VMT). The VT and VMT inputs used for the CalEEMod modeling are derived from the VMT modeling used in the transportation analysis in Section 4.14, *Transportation*. The VT and VMT estimates are obtained by using the City of Los Angeles Travel Demand Forecasting (TDF) Model for the analysis of the 2021 baseline year and the future 2029 scenario. The City's TDF Model includes among other inputs, population estimates and forecasts. The population estimates and forecasts in the TDF Model rely on SCAG Regional Transportation Plan/Sustainable Communities

Strategy (RTP/SCS) data for those estimates and forecasts. The current TDF Model which was developed in last few years as part of the City's effort to move to VMT thresholds of significance relied on SCAG's 2016-2040 RTP/SCS. The City TDF Model is updated when the RTP/SCS is updated, which is every four years. The 2020 SCAG RTP/SCS was adopted in September 2020. The City is currently seeking funds to update the model. Based on this, the VT and VMT data for the 2021 baseline year used in the City of Los Angeles TDF Model for the Proposed Project were interpolated from the 2016 and 2040 TDF Model results. Those population estimates and forecasts derive from 2016-2040 SCAG RTP/SCS population estimates and forecasts. The TDF Model is the best tool the City has available to estimate VT and VMT data. It is a significant work product to update the TDF Model and costs approximately $400,000. It would not be reasonable to update the TDF Model every time the City prepares a new EIR. Similar to GHG and Air Quality analysis, the impact analysis for Utilities-electricity and natural gas, uses the CalEEMod model to estimate impacts. (Draft EIR at 4.16-61.) Utilities analysis for water supply and facilities, wastewater capacity and facilities and stormwater facilities does not rely on population estimates for analyzing impacts but instead determines impacts based on the number of new housing units proposed to be connected by the Proposed Project and applicable utility rates per housing unit, including whether those additional units are planned for in the City's utility plans, such as the Urban Water Management Plan for potable and recycled water. (Draft EIR at 4.16-12; 4.16-47.)

POPULATION FIGURES USED FOR BASELINE CONDITIONS

The Draft EIR baseline population of 3,923,341 came from the California Department of Finance (DOF) population estimate for January 1, 2021.[6] [7] The DOF estimate is supported with substantial evidence.[8]

As discussed in the Draft EIR at 4.11-1, *Population and Housing*, current population estimates and future population forecasts are prepared by a variety of sources and there is not one definitive source. The government sources available and used or relied on by the City are traditionally the following: U.S. Census Bureau, California Department of Finance (DOF), California Employment Development Department (EDD), the Southern California Association of Governments (SCAG), the City of Los Angeles Department of City Planning (DCP).

Historically, the leading source of demographic data is the U.S. Census. While Census data is typically the most reliable representation of socioeconomic data, such as housing and population, for discrete geographic areas, it is only available on a decennial basis, i.e., 2000, 2010, and 2020. In the interim years, the U.S. Census Bureau gathers more detailed socioeconomic data through other surveys, such as the ACS program, which provides data on an annual basis for certain geographies. For example, the ACS provides annual estimates for incorporated cities but does not provide annual estimates for Community Plan Areas. There is a lag time between when the data is collected and when it is released for both Census products. Both the decennial Census and ACS data are subject to sampling variability.

SCAG, as the Regional Transportation Planning Agency (RTPA) and the Metropolitan Planning Organization (MPO), publishes demographic estimates and projections through the long-range

[6] January 1, 2021 DOF population estimates for California Cities are provided online at https://dof.ca.gov/Forecasting/Demographics/Estimates/e-1/documents/RankCities_2021.xlsx

[7] As discussed in Section 4.14, *Transportation*, the TDF Model was used to generate the 2021 Baseline and 2029 Housing Element Update plan data for the transportation impact analysis (which, in turn, informed the air quality, GHG, and utilities [i.e., electricity and gas] analyses). The TDF Model's base year is 2016; therefore, the socioeconomic inputs and transportation network within the TDF were updated to represent the 2021 Baseline scenario and the 2029 with Housing Element scenario. To develop the 2021 Baseline scenario, based on the original 2016 base year model, model-wide socioeconomic data and related matrices were interpolated to 2021. Transportation networks were also updated to reflect transportation projects completed by 2021, according to the SCAG 2020-2045 RTP/SCS. To develop the 2029 with Housing Element Scenario, based on the original 2040 future year model (i.e., without the development resulting from the 2029 Housing Element Update), model-wide socioeconomic data and related matrices were interpolated to 2029. Transportation networks were also updated to reflect only those transportation projects expected to be completed by 2029 according to the SCAG 2020-2045 RTP/SCS by removing transportation projects with an expected completion year after 2029.
While the TDF Model used for VMT impacts in Transportation (which in turn informed the Air Quality, GHG and Utilities-Electricity and Gas analysis) relied on the interpolated population from SCAG's 2016-2040 RTP/SCS for 2021. The model used an interpolated figure of 4,041,645 which was estimated to be within the margin of error (3%) for the TDF Model calculator and the CalEEMod model in comparison to the 3,923,341 baseline population figure used in the Draft EIR. Additionally, as discussed above, the TDF Model is the best available model the City has to estimate VMT impacts and it was not feasible to update the TDF Model for the Proposed Project with the DOF population estimate. Additionally, the CalEEMod is the best available model to analyze Air Quality, GHG and Utilities-electricity and gas impacts.

[8] The DOF methodology for population estimates is found online at https://dof.ca.gov/Forecasting/Demographics/Estimates/e-1/

RTP/SCS, which is updated by SCAG every four years. Census and ACS data, as well as DOF data is utilized by SCAG to prepare regional demographic estimates and forecasts. The RTP/SCS provides a vision for transportation investments throughout the region. Using demographic growth forecasts and economic trends that project out over a 20-year period or "horizon," typically, the RTP/SCS considers the role of transportation in regional planning in the broader context of economic, environmental, and quality-of-life goals for the region. SCAG data are commonly utilized by planning agencies in the region for consistency with the goals and demographic data of the RTP/SCS. It is Los Angeles City Planning's practice to use SCAG RTP/SCS demographic data as a benchmark or as a reference point for recent estimates and projections locally.

As previously discussed, the SCAG 2016-2040 RTP/SCS population estimates are used in the City's TDF Model and informed the air quality, GHG, transportation and utilities-electricity and gas, analysis. Additionally, the 2020-2045 SCAG RTP/SCS population forecasts were relied on in the Draft EIR. (Draft EIR at 4-15.)

As discussed in Population and Housing, Section 4.11, at page 4.11-2, the population in the City in the 2020-2045 RTP/SCS for 2016 was 3,933,800. The population in the City in the 2016-2040 RTP/SCS for 2016 was 3,928,799. The 2021 interpolated population for the City from the 2020-2045 RTP/SCS is 4,075,452. The 2021 interpolated population for the City from the 2016-2045 RTP/SCS is 4,069,856. The ACS 5-year average showed the population in 2019 as 3,966,936 and the ACS 1-year average showed the population in 2019 as 3,979,537. The DOF estimate was 3,923,341. As previously demonstrated, demography is not a perfect science. Demography is a specialized field of study, and technical expertise is required to do population estimates. Different expert sources provide different population estimates.

Selecting the DOF estimate was supported with substantial evidence as DOF's estimates are prepared by the Demographic Research Unit, professional demographers that prepare annual population estimates for the state, counties and cities.[9] Additionally, the DOF estimate was within 1.1 percent of the ACS 5-year estimate and 1.4 percent of the ACS 1-year estimate. It was also within 3.7 percent of the 2016-2040 RTP/SCS interpolated estimate and within 3.8 percent of the 2020-2045 RTP/SCS interpolated estimate.

IT IS NOT APPROPRIATE TO UPDATE THE CENSUS NUMBERS

The City does not find it necessary or appropriate to adjust the population baseline used in the Draft EIR to the 2020 Census population estimate. The 2020 Census was undertaken in April to October of 2020, in the middle of the worst of the 2020 COVID-19 pandemic. The 2020 COVID-19 pandemic is a

[9] https://dof.ca.gov/Forecasting/Demographics/documents/DRU-Brochure.pdf

worldwide pandemic that has resulted in extraordinary conditions, including a complete shut-down of schools, businesses and other public gathering places in the Plan Area, the City, State and the Nation. Most people were effectively quarantined at home and telecommuting in compliance with Safer at Home orders. Many people lost their jobs. Some people even tragically got very sick and died. Some of the worst impacts were (and continue to be) felt in lower income communities of color, which overlaps with areas where Census undercounts were reported.[10] In short, the 2020 Census survey was conducted in a time when large portions of the community had their lives wholly disrupted. As discussed in the Draft EIR, the pandemic only made it more difficult to conduct the necessary census-related outreach which ensures full participation of hard-to-reach populations. (Draft EIR at 4.11-3.) Additionally, it is not clear what extent the results were impacted by the well-publicized controversial proposal by the Trump Administration to add a citizenship question to the Census, but there were indications that it could have impacted the participation of the undocumented and non-citizen community.[11]

Based on the preceding discussion, the City elects to rely on the DOF 2021 estimate, which also considered the effects of the pandemic on population, but did not rely wholly on responses of a survey during the pandemic.[12] Finally, the difference between the population estimate used in the Draft EIR of 3,923,341 is less than one percent higher than the Census figure of 3,898,747, which also supports that the City's estimate is backed with substantial evidence.

UPDATING THE POPULATION BASELINE IN THE DRAFT EIR WITH THE CENSUS NUMBERS WOULD NOT RESULT IN NEW OR MORE SEVERE SIGNIFICANT IMPACTS.

As previously discussed, the evidence does not support using the Census figure as the baseline figure for the Draft EIR. However, even if the City were to update the population estimate it would not result in new significant impacts or more significant impacts from those identified in the Draft EIR.

As an initial matter, changing the baseline population number would not affect any impact analysis in the following sections for the reasons previously stated that population is not relevant to the impact analysis: aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, tribal cultural

[10] https://knowledge.luskin.ucla.edu/wp-content/uploads/2021/08/Potential-Differential-Undercount-in-LA-2020-Census.pdf; https://newsroom.ucla.edu/releases/los-angeles-county-census-participation-covid-19

[11] https://www.brookings.edu/blog/the-avenue/2020/08/07/trumps-new-plan-to-hijack-the-census-will-imperil-americas-future/ (recognizing that discussion of citizenship question on Census resulted in documented fear and that Census Bureau's own research showed that the addition of a citizenship question would result in 5-8 percent of noncitizen households not answering the Census.)

[12] https://dof.ca.gov/Forecasting/Demographics/Estimates/E-1/documents/E-1_2021PressRelease.pdf

resources, and wildfire. Additionally, for the reasons previously discussed, it would not affect the transportation analysis, air quality, GHG or utilities.

As to public services, recreation, and population, reducing the population baseline by approximately 25,000 persons would present an insignificant revision and would not change impact conclusions because the difference between the population estimate of 3,923,341 referenced in the Draft EIR and the population estimate of 3,898,747 included in the 2020 Census would be within a less than 1 percent margin of error. As previously discussed, demography is an imperfect science and reasonable differences in demographic estimates are to be expected, particularly as a result of challenges associated with the 2020 COVID-19 pandemic.

2.5 STATE LEGISLATION – SB 9 AND SB 10

After the Draft EIR was prepared, the state legislature passed two Senate Bills (SB) which have implications for zoning regulations in California, including SB 9 and SB 10. This section provides a discussion of these two bills as they relate to the analysis presented in the Final EIR, and concludes that the passage of SB 9 and SB 10 does not result in significant new information under CEQA Guidelines Section 15088.5 as a result of causing a new significant impact or a substantial increase in the severity of an environmental impact.

SB 9

Senate Bill SB 9, approved by the Governor on September 16, 2021, is intended to expand the supply of smaller-scaled (or missing-middle) housing in neighborhoods zoned for single-family residential, by allowing for up to four units to be constructed on a single-family zoned lot if split into two lots. A central provision of the bill is that it would require ministerial approval of a lot split, as well as ministerial approval of a housing development containing two units in a single-family residential zone, if the proposed development meets certain requirements. Projects are ineligible for the provisions of SB 9 if they require demolition or alteration of existing affordable or rent stabilized housing, or if they are located within certain sensitive areas such as wetlands, fire hazard zones (unless mitigation measures are in place), hazardous waste sites, earthquake fault zones, floodplains, floodways, conservation areas, habitat areas for certain species, or sites with certain historic designations. As the housing developments are required to be approved ministerially, and jurisdictions may only apply objective standards in reviewing the project, the approval of the individual lot splits and development projects would not be subject to CEQA. The bill takes effect on January 1, 2022.

The Final EIR analyzes the potential environmental impacts that could result from the build-out of the City's RHNA Allocation, including through the development of low-scale multifamily development such as duplexes and fourplexes, in addition to the development of single-family residential development. As discussed, the build-out of the RHNA is anticipated to occur in any location in the City where residential uses are permitted, including in areas that are currently zoned to permit single-family residential development. Additionally, the Rezoning Program analyzed in the Final EIR anticipates the creation of additional residential zoned capacity in areas currently zoned for single-family residential use, particularly in Higher Resource Areas where SB 9 projects may be more likely to be constructed due to favorable market conditions. As described in Section 2.1.1 above, the Rezoning Program includes a variety of strategies, including those that would create opportunities for missing middle housing typologies such as duplexes and fourplexes. Overall, the provisions of SB 9 are consistent with the policy objectives and programs included in the draft Housing Element Update, though a local implementation ordinance to address community concerns is also envisioned as part of the implementation programs included in the draft plan.

Although the State has not yet issued guidance, zoning capacity allowed as a result of SB 9 does not appear to be eligible to be considered as part of the Inventory of Adequate Sites for the purposes of demonstrating existing zoned capacity to accommodate the RHNA. This is due to the fact that existing zoned capacity must be in place at the time that the Housing Element is adopted, and SB 9 does not become effective until January 1, 2022. In addition, it appears that zoning capacity created as a result of state legislation cannot be counted as part of a local jurisdiction's Rezoning Program, as Housing Element law refers to actions by a city or county, but further clarification is being sought. However, it is anticipated that any added capacities will be able to be accounted for in future Housing Element cycles and units will be able to be counted towards meeting the RHNA each year.

Nonetheless, implementation of SB 9 is not anticipated to result in new unanticipated growth or change development patterns in the City. While it is difficult to anticipate the number of housing units that are likely to be developed under the provisions of SB 9, a recent study has suggested that the potential impacts will not be substantial.[13] The study found that, in addition to the site-level requirements in the bill, other physical constraints, such as small lot sizes and other local regulations, in addition to market constraints, can limit the overall number of new homes constructed as a result of the bill. As a result, the study finds that SB 9 will result in only a modest change in the overall number of housing units that could be built, anticipating that while 355,000 parcels are eligible for SB 9, only a total of 37,500 market-feasible units would be developed in the City. Given that the Housing Element Update

[13] Terner Center for Housing Innovation, "Will Allowing Duplexes and Lot Splits on Parcels Zoned for Single-Family Create New Homes?", Accessed October 7, 2021 at https://ternercenter.berkeley.edu/research-and-policy/duplexes-lot-split-sb-9/

anticipates the development of 420,327 units during the planning period, this represents a small fraction (less than 9%) of the overall development expected to occur over the next eight years. Housing units developed as a result of SB 9 would contribute to the overall production needed to meet the RHNA, and would not result in substantial new housing development exceeding the RHNA Allocation. As a result, the City finds that the passage of SB 9 is not anticipated to result in substantial new environmental impacts.

Furthermore, due to the limitations on the types of development projects that are eligible for the provisions of SB 9, including those that restrict the demolition of existing housing units, restrict development in fire hazard areas, and limit the use of historical resources, the implementation of SB 9 is not anticipated to have new significant impacts beyond those already identified in the Final EIR.

SB 10

Senate Bill 10, approved by the Governor on September 16, 2021, creates an optional process that jurisdictions may follow to streamline approval of certain rezonings that would allow up to 10 units on a parcel. SB 10 authorizes, until January 1, 2029, a local government to adopt an ordinance to zone any parcel for up to 10 units of residential density per parcel, if the parcel is located in a transit-rich area or an urban infill site. Any adoption of such an ordinance under these provisions, as well as any accompanying resolution, ordinance, or local regulation consistent with that ordinance, is not a project for the purposes of CEQA. Certain requirements apply to the adoption of the rezoning ordinance, including the requirement to find that the ordinance is consistent with the jurisdiction's obligation to affirmatively further fair housing. To take effect, SB 10 requires separate legislative action by the City Council to adopt the individual rezoning.

The Proposed Project includes a Rezoning Program, which the City must implement within three years. Implementation of the Rezoning Program will be carried out by subsequent adoption of legislative actions, including revisions to the Land Use Element and amendments to the Zoning Code. As described in the Final EIR, the Rezoning Program includes a variety of rezoning strategies, including those that would create opportunities for missing middle housing typologies. There may be some potential overlap between anticipated rezoning ordinances and rezoning that could be accommodated using the provisions of SB 10. Additionally, the requirement for any rezoning accommodated under the provisions of SB 10 to be demonstrated to affirmatively further fair housing is consistent with the overall priorities of the Proposed Project, which is to pursue an equitable rezoning program that furthers fair housing goals by creating housing capacity in higher resource areas. With the above said, the City Council, which is the decision-making body which would adopt any rezoning effort, passed a resolution opposing SB 10 (see Council File 21-0002-S21).

The adoption of SB 10 does not constitute substantial new information or a change in circumstance that would result in substantial new environmental impacts. As discussed throughout the Final EIR, the Proposed Project that is analyzed in this Final EIR is the build out of the City's RHNA Allocation during the eight-year planning period. The Rezoning Program is necessary to satisfy the RHNA. As described, SB 10 would facilitate the types of rezoning strategies that are already contemplated in the Final EIR. Therefore, any rezoning that may occur using the provisions of SB 10 would be consistent with that analyzed in the Final EIR, and would be needed to accommodate the housing development that is analyzed in the Final EIR.

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3 RESPONSES TO COMMENTS

This chapter of the Final Environmental Impact Report (EIR) contains all comments received on the Draft EIR prepared for the "Proposed Project," which includes the Los Angeles Citywide Housing Element 2021-2029 Update and Rezoning Program (hereafter, referred to as "Housing Element Update") and 2021 Safety Element Update and targeted updates to the Plan for a Healthy Los Angeles (hereafter referred to as the "Safety Element Update"), during the public review period, as well as responses to each of those comments.

The Los Angeles Department of City Planning (DCP or City) has evaluated all comments related to environmental issues received from public agencies and other interested parties and has prepared written responses to each comment describing the disposition of significant environmental issues raised in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. Where appropriate and applicable to potential environmental impacts, the basis for incorporating or not incorporating specific suggestions into the Proposed Project is provided. In each case, DCP has made a good faith effort, supported by reasoned analysis, to respond to comments. Although some letters may raise legal or planning issues, these issues do not always constitute significant environmental issues. In such cases, specific responses are not provided. Rather, the applicable Master Response is identified, which either provides clarification or addresses common non-CEQA issues raised throughout multiple comment letters. While this Final EIR does not respond directly to such comments, all comments have been reviewed and considered. Some comments are addressed through revisions, clarifications, and corrections to the Proposed Project (presented in Chapter 2 of the Final EIR), Draft EIR (presented in Chapter 4 of the Final EIR), and/or in the Staff Report. All of the comments are included in the administrative record and have been forwarded to decision-makers for their consideration in taking action on the Proposed Project.

The City has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts that would warrant recirculation of the Draft EIR. The City Council finds that all information added to the EIR after publication of the notice of the availability of the Draft EIR for public review but before certification merely clarifies, amplifies, or makes insignificant modifications to an adequate EIR and does not require recirculation. The City Council has based its actions on a full evaluation of all comments in the record of proceedings, concerning the environmental impacts identified and analyzed in the EIR.

3.1 LIST OF COMMENTERS

The Draft EIR was circulated for a 45-day review public period that began on July 22, 2021 and ended on September 7, 2021. During this review period, the City received comment letters from two public agencies, 10 groups/organizations, and 68 individuals. Table 3-1 identifies all letters received during the public review period. As shown in the table, the letters have been grouped by type of commenter (i.e., Agency [A], Organization [O], and Individual [I]) and have been assigned an alphanumeric identifier primarily based on date received. Among the letters received by Individuals, two separate commenters (i.e., Casey Maddren and Tom Williams) raised specific concerns regarding the adequacy of the Draft EIR whereas the remaining commenters raise non-CEQA issues pertaining solely to the Proposed Project and/or other topics unrelated to the Draft EIR. Therefore, these two letters are addressed first to maintain the focus on the Draft EIR prepared for the Proposed Project. The comment letters are compiled and included in their entirety in Appendix L.

Each issue raised by the commenter, if more than one, has been bracketed and sequentially numbered to accurately attribute an appropriate response. Since a number of letters raise common issues, Master Responses have been prepared to provide comprehensive response to provide clarification or to address general and non-CEQA issues that were brought up multiple times. These Master Responses are presented in Section 3.2 (*Master Responses to Comments Received on the Draft EIR*) and referenced throughout Section 3.3 (*Summary Comments and Responses to Individual Comments*), as applicable. Section 3.3 addresses all comment letters and provides a summary of each comment followed by its respective response. For example, Response A-1.1 indicates that the response is for the first issue raised in comment Letter A-1.

Any changes made to the text of the Draft EIR correcting information, data, or intent, other than minor typographical corrections or minor working changes, are noted in Chapter 4, *Revisions, Clarification and Corrections to the Draft EIR*, as changes from the Draft EIR. Where a comment results in a change to the Draft EIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by strikeouts (~~strikeouts~~) where text is removed and by underlined font (<u>underlined font</u>) where text is added.

Table 3-1 List of Commenters on the Draft EIR

No.	Name	Agency/Organization	Date of Letter	Page
Agency (A)				
A-1	Nury Martinez Council President Councilmember 6th District	Los Angeles City Council	August 13, 2021	3-10
A-2	Miya Edmonson IGR/CEQA Branch Chief	California Department of Transportation District 7 – Office of Regional Planning 100 S Main Street, MS 16 Los Angeles, CA 90012	September 1, 2021	3-11
Organizations (O)				
O-1	Anthony Dedousis Director, Policy and Research	Abundant Housing LA 515 S Flower Street, 18th Floor Los Angeles, CA 90071	July 28, 2021	3-13
O-2	Robert Apodaca Vice-Chair Director of Public Policy	The Two Hundred	August 6, 2021	3-18
O-3	Laura Raymond Director	Alliance for Community Transit - LA	August 19, 2021	3-20
O-4	Philip Armstrong President	Rampart Village Neighborhood Council 155 N Occidental Boulevard, Suite 236 Los Angeles, CA 90026	August 20, 2021	3-21
O-5	Elizabeth Campos Layne President	Del Rey Residents Association	September 1, 2021	3-22
O-6	Michelle A. Bisnoff Chairperson	Brentwood Community Council	September 6, 2021	3-26
O-7	Christina Spitz Secretary	Pacific Palisades Community Council	September 7, 2021	3-40
O-8	Tony Gittelson	Livable Communities Initiative	September 7, 2021	3-42
O-9	Elizabeth Reid-Wainscoat Urban Wildlands Campaigner	Center for Biological Diversity 660 S Figueroa Street, Suite 1000 Los Angeles, CA 90017	September 7, 2021	3-43
O-10	Kimberly Christensen, AICP Land Use Committee Co-Chair	Westside Neighborhood Council P.O. Box 64370 Los Angeles, CA 90064	September 7, 2021	3-52
Individuals (I)				
I-1	Tom Williams		July 22, 2021	3-64
I-2	Casey Maddren		September 7, 2021	3-65
I-3	George Papanikolas		July 22, 2021	3-69
I-4	Janis Hatlestad		July 22, 2021	3-70
I-5	Eric Preven		July 22, 2021	3-71
I-6	Katrina Jenkins		July 22, 2021	3-72
I-7	PB		July 23, 2021	3-73

No.	Name	Agency/Organization	Date of Letter	Page
I-8	Brian Trautmant		July 23, 2021	3-74
I-9	Eric Preven		July 28, 2021	3-75
I-10	Thomas Szelazek		July 28, 2021	3-76
I-11	Brennan Lawson		July 28, 2021	3-76
I-12	Anthony Castelletto		July 28, 2021	3-76
I-13	Chase Englehardt		July 28, 2021	3-76
I-14	Jennifer Martinez		July 28, 2021	3-76
I-15	Colleen OBrien		July 28, 2021	3-76
I-16	Mark and Marsha Novak		July 28, 2021	3-76
I-17	Chad Stinson		July 28, 2021	3-76
I-18	Sarah Back		July 28, 2021	3-76
I-19	Stanley Johnson		July 28, 2021	3-76
I-20	Golden Bachelder		July 28, 2021	3-76
I-21	Andrew Silver		July 28, 2021	3-76
I-22	Elizabeth Srorka		July 28, 2021	3-76
I-23	Rafael Sands		July 28, 2021	3-76
I-24	Alec Mitchell		July 28, 2021	3-76
I-25	Chelsea Bangasser		July 28, 2021	3-76
I-26	Chelsea Byers		July 28, 2021	3-76
I-27	Greg Chasen		July 28, 2021	3-76
I-28	Marcus Owens		July 28, 2021	3-76
I-29	Babak Mozaffari		July 28, 2021	3-76
I-30	Kyle Chrise		July 28, 2021	3-76
I-31	Bruce VanVoorhis		July 28, 2021	3-76
I-32	Tom Vonsburgh		July 28, 2021	3-76
I-33	Michael Hayes		July 28, 2021	3-76
I-34	Mehnaaz Chowdhury		July 28, 2021	3-76
I-35	Tanya Lebeck		July 28, 2021	3-76
I-36	Ben Creed		July 28, 2021	3-76
I-37	Eddie Isaacs		July 28, 2021	3-76
I-38	Terence Heuston		July 29, 2021	3-76
I-39	Mary Rose Fissinger		July 29, 2021	3-76
I-40	Steven Guerry		July 29, 2021	3-76
I-41	Carey Bennett		July 29, 2021	3-76
I-42	Jessamyn Prince		July 29, 2021	3-76
I-43	Nicholas Burns		July 29, 2021	3-76
I-44	Catherine Fabre		July 29, 2021	3-76

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I-46	Bob C		July 29, 2021	3-76
I-47	Marek Slipski		July 29, 2021	3-76
I-48	Tommy Atlee		July 29, 2021	3-76
I-49	Elisa Visick		July 29, 2021	3-76
I-50	Daniel Poineau		July 29, 2021	3-76
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I-54	Mark Larson		July 30, 2021	3-76
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I-56	Verity Freebern		July 31, 2021	3-76
I-57	Zennon Ulyate-Crow		July 31, 2021	3-76
I-58	Ryan Leaderman		August 4, 2021	3-77
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I-66	Marie Lipton		September 6, 2021	3-85
I-67	Jennifer Cox		September 7, 2021	3-86
I-68	Monica Dragavon		September 7, 2021	3-87

3.2 MASTER RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR

A number of the comments raised common issues or required clarifications among the purpose of the Proposed Project, Draft EIR, and responses to comments under CEQA. Therefore, rather than responding to each comment individually, the following Master Responses have been prepared to provide single comprehensive clarifications and/or responses to address general comments, particularly on non-CEQA issues, that were brought up in multiple instances.

Master Responses

1. Purpose of the Proposed Project

The underlying purpose of the Proposed Project is to accommodate the Regional Housing Needs Assessment (RHNA) compliant with State law and consistent with the City's General Plan, and to update the City's Safety Element to be consistent with current State regulations. In general, the Proposed Project aims to meet the City's fair share of the regional housing need to accommodate projected population growth and meet existing housing needs within the city; increase the availability of affordable housing and the variety of housing options within the city; and strengthen the City's goals, policies, objectives, and programs that prevent displacement, promote homeless prevention and diversion, and promote housing stability. In addition, the Proposed Project aims to promote housing development in High and Very High Resource areas and in areas with good access to jobs, services, and high-quality public transit; and strengthen goals, objectives and programs that reduce greenhouse gas emissions and promote climate resiliency. Both the underlying purpose and the project objectives are consistent with the City's Framework Element and the Southern California Association of Governments (SCAG) Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS).

2. Purpose of the EIR

In accordance with Public Resources Code (PRC) Section 21061, generally, the purpose of this EIR is to evaluate potential environmental impacts resulting from the Proposed Project, identify the significant impacts, describe feasible mitigation measures that could minimize significant impacts, and describe a reasonable range of alternatives that would avoid or substantially lessen any of the significant environmental impacts of the Proposed Project while attaining most of the basic objectives of the Proposed Project (CEQA Guidelines Sections 15126.2, 15126.4, 15126.6.).

3. Significant Impacts under CEQA

CEQA Guidelines were recently amended to reflect recent case law to clarify that CEQA, with limited exceptions, is focused on the analysis of impacts of the project on the environment and not impacts of the

existing environment on the project, unless the project exacerbates existing environmental conditions and that results in an impact to the project. So, for example, while freeway pollution impacts to future residents of a proposed project adjacent to a freeway would be an important consideration in the project approval process, the impacts would not be a significant impact under CEQA absent substantial evidence supporting that the project is exacerbating the existing freeway pollution condition.

Furthermore, as defined in CEQA Guidelines Section 15382, a "significant effect on the environment" means "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." In addition, an "economic or social change by itself shall not be considered a significant effect on the environment."

4. Responses to Comments under CEQA

Pursuant to PRC Section 21091(d), the DCP considered all comments received on the Draft EIR. This section of the Final EIR provides written responses describing the "disposition of each significant environmental issue that is raised by commenters," per CEQA Guidelines Section 15088, which also states:

> The Lead Agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.

CEQA Guidelines Section 15204 further states that "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors," which has been upheld by CEQA case law. Rather, when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 also directs commenters to focus on the sufficiency of the EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. It also states that, at the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, based on the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. It further indicates that commenters should provide an explanation and evidence supporting their comments (CEQA Guidelines Section 15204). An effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion (CEQA Guidelines Section 15064). Under CEQA, the

decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency based on substantial evidence in the record.

Therefore, for the purpose of this section of the Final EIR and per CEQA Guidelines Section 15204, detailed responses are not necessarily provided for comments that do not relate either to significant environmental issues or adequacy of the analysis in the EIR. This includes comments that raise issues that are not environmental impacts as identified by CEQA (e.g., property values and other socioeconomic concerns), or relate to unsupported opinions regarding the adequacy of the EIR analysis and/or the EIR's findings of significance.

5. Comments Regarding the Adequacy of the EIR

The analysis in the EIR prepared for the Proposed Project is based on scientific and factual data that has been reviewed by the lead agency and reflects its independent judgment and conclusions. CEQA permits disagreements between experts with respect to environmental issues addressed in an EIR. As stated in CEQA Guidelines Section 15151, "disagreement among experts does not make an EIR inadequate. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

Several comments raise significant environmental issues (such as those that challenge the adequacy or correctness of the information, analysis and/or conclusions in the EIR, including identifying impacts as significant), but do not provide substantial evidence to support the comment. These comments are too general to facilitate a meaningful response. Substantial evidence is defined as: "fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact" (PRC Section 21080(e)(1)). Substantial evidence is not "argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment" (PRC Section 21080(e)(2)). The City is not required to and does not provide a detailed response for comments lacking substantial evidence. According to CEQA Guidelines Section 15088, the level of detail contained in the Lead Agency's response may match the level of detail provided in the comment (i.e., responses to general comments may also, in turn, be general), and a "general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment."

In addition, per CEQA Guidelines Section 15204, detailed responses are not necessarily provided for comments that do not relate either to significant environmental issues or adequacy of the analysis in the EIR. This includes comments that raise issues that are not environmental impacts as identified by CEQA

(e.g., property values and other socioeconomic concerns), or relate to unsupported opinions regarding the adequacy of the EIR analysis and/or the EIR's findings of significance.

6. Comments Requesting Specific Changes to the Proposed Project via the EIR

The EIR is not intended or required to provide justification for the Proposed Project. Rather, the EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that the Proposed Project is likely to have on the environment. This EIR also identifies ways in which the significant effects of the Proposed Project might be minimized and identifies alternatives to the Proposed Project. The City is not required to consider such comments or requests to change the Proposed Project in its CEQA analysis absent a commenter providing substantial evidence that the proposed change would feasibly reduce one or more significant adverse environmental impacts identified in the EIR. Requests for changes to the Proposed Project may be addressed through the planning process outside of the CEQA process.

7. Comments Providing General Descriptions and/or Opinions, including Support for, or Opposition to, the Proposed Project

Comments providing general descriptions or summaries, whether of organization/agency affiliations, the Proposed Project, or the Draft EIR, are noted but do not require a response because they are provided for informational purposes. Many commenters also express their opinion in support of, or in opposition to, the Proposed Project in whole or in part. While the City welcomes all comments, including opinions and expressions of opposition or support unrelated to environmental impacts, these comments are appropriately addressed outside the CEQA process. Opinions concerning issues not addressed by CEQA are made a part of the administrative record and are forwarded to the decision-makers for their consideration in taking action on the Project, but they are not responded to in a CEQA document.

Summary of Master Responses

The City is required to provide written responses to comments that raise significant environmental issues. Many comments raise issues that are important to the decision-making process but are not required to be addressed as part of the CEQA process because they do not raise significant environmental issues. Such comments do not require a response in the Final EIR and generally have not been provided a response separate from the Master Responses, above.

3.3 SUMMARY COMMENTS AND RESPONSES TO INDIVIDUAL COMMENTS

LETTER A-1

COMMENTER: Nury Martinez, Council President, Councilmember 6th District
Los Angeles City Council

DATE: August 13, 2021

Response A-1.1

The comment describes the City's historical housing shortage, commends the DCP for their efforts in undertaking the Housing Element Update, and provides suggestions to modify and strengthen existing Project programs (e.g., incentive programs, the Rezoning Program) to address the housing crisis and better facilitate housing under the Housing Element Update.

The commenter's suggestions regarding the Housing Element Update programs are noted but do not pertain to the EIR. Please see Master Response 6 in Section 3.2.

LETTER A-2

COMMENTER: Miya Edmonson, IGR/CEQA Branch Chief
California Department of Transportation
100 S Main Street, MS 16
Los Angeles, CA 90012

DATE: September 1, 2021

Response A-2.1

The comment provides a description of the Proposed Project and summarizes the respective intents of the Housing Element Update and Safety Element Update.

The commenter's summary is noted and provided for informational purposes. Please see Master Response 7 in Section 3.2.

Response A-2.2

The comment refers to the Draft EIR finding that impacts related to vehicle miles traveled (VMT) would be less than significant but that future individual housing developments may result in significant VMT impacts. The commenter agrees with the use of Transportation Demand Management (TDM) programs to reduce VMT impacts associated with future individual housing developments and supports future collaboration with the City in identifying TDM strategies to limit VMT at the project level.

To clarify, the Draft EIR found that individual housing development projects accommodated by the Housing Element Update may exceed the development project specific threshold for VMT impacts; however, at the plan level build out of the RHNA under the Housing Element Update is not anticipated to increase VMT under the City's thresholds of significance. Nonetheless, Section 4.14, *Transportation*, of the Draft EIR identifies Mitigation Measure 4.14-2 (Transportation Demand Management Program) for future discretionary projects that result in potentially significant impacts to VMT. The commenter's support for the use of TDM programs is noted. Under Mitigation Measure 4.14-2, the City will continue to pursue strategies to limit VMT as part of environmental reviews of individual development projects.

Response A.2-3

The comment notes that the Rezoning Program would prioritize development opportunities near Transit Priority Areas (TPA), near job centers, and higher resource areas. The commenter supports this

prioritization as it would also limit VMT associated reasonably foreseeable development under the Proposed Project.

The commenter's support for prioritization of housing near TPAs, job centers, and higher resource areas is noted. Under Mitigation Measure 4.14-2 in Section 4.14, *Transportation*, of the Draft EIR, the City will continue to pursue strategies to limit VMT as part of environmental reviews of individual development projects.

Response A-2.4

The comment agrees with the Draft EIR finding that impacts related to highway safety would be significant and unavoidable and supports future collaboration with the City in identifying specific queueing impacts and solutions during individual housing development reviews that are facilitated by the Housing Element Update.

The commenter's agreement with the Draft EIR finding regarding highway safety is noted. As discussed in Section 4.14, *Transportation*, of the Draft EIR, without specific information on where safety impacts may occur as a result of freeway off ramp queuing, it is not possible to identify appropriate mitigation measures to reduce hazards related to queuing, which may include, but are not limited to, TDM strategies, investments to active transportation infrastructure, and changes to ramp operations (e.g., lane reassignment, signalization). Nonetheless, the City will continue to seek solutions to highway safety concerns as part of the environmental reviews of individual development projects.

LETTER O-1

COMMENTER: Anthony Dedousis, Director, Policy and Research
Abundant Housing LA
515 S Flower Street, 18th Floor
Los Angeles, CA 90071

DATE: July 28, 2021

Response O-1.1

The comment provides a description of Abundant Housing LA and YIMBY Law and their respective support for more affordable housing and reforms to land use and zoning codes. The comment calls for a Housing Element Update that distributes the RHNA Allocation, including the 184,000 affordable units, to each of the City's Community Plan Areas (CPA) in an equitable way, including high-opportunity neighborhoods and those neighborhoods that have historically blocked new housing through exclusionary zoning. The comment states that while the Housing Element Update plans for growth, there must be no conversion of wildlife habitat to accommodate housing development.

The commenter's description of their organization affiliations are noted. The commenter's suggestions for the Housing Element Update are noted, but do not pertain to the EIR. Please see Master Response 4 in Section 3.2. Nonetheless, through its policies and programs, the Housing Element Update seeks to support the vision of an equitable, livable, sustainable city that meets the needs of the population through a thoughtful balanced distribution of different types of housing types. The Housing Element Update also calls for the adoption of updates to Community Plans, Transit Neighborhood Plans, Specific Plans, and Citywide ordinances to establish appropriate land uses, densities, and mixes of housing types and levels of affordability in areas that are well served by public transit and are employment/activity centers, and where the potential for displacement is minimized, particularly in High and Very High Resource areas.

The commenter's request that wildlife habitat is not converted to housing is noted. The Rezoning Program does not increase housing capacity in certain areas that support wildlife habitat, including the Very High Fire Hazard Severity Zones and coastal areas that are vulnerable to Sea Level Rise. However, the Housing Element Update accommodates the development of 420,327 new housing units throughout the city. Housing development accommodated under the Housing Element Update is expected to focus on encouraging development on infill sites in urbanized areas of the City, but it is reasonable to assume that some development would occur within or adjacent to natural areas that support special-status species.

Impacts to biological resources are discussed in Section 4.12, *Biological Resources*, of the Draft EIR. As discussed in Section 4.12, impacts to special status species or their habitat, riparian habitat or other sensitive natural community, and wildlife corridors would be significant even with implementation of mitigation to address respective impacts. Mitigation measures 4.3-1(a)-(d) and 4.3-2(a) and (b) would reduce such impacts related to discretionary projects; however, similar mitigation would not apply to ministerial projects and would not eliminate all potential impacts to special-status species from implementation of these projects. Applying these mitigation measures to ministerial projects is infeasible based on the necessary resources to implement and administer the measure and the burden to needed housing. In addition, without knowing all site-specific conditions and depending on circumstances, even when applying mitigation measures, impacts may still occur. Therefore, impacts related to special status species and/or their habitat, riparian habitat/other sensitive natural communities, and wildlife corridors under the Housing Element Update are significant and unavoidable at this stage of planning.

Response O-1.2

The comment summarizes both organizations' efforts in engaging with the City and participating in the Housing Element Update process since its inception in early 2020.

The commenter's summary of ongoing participation in the public outreach and environmental review processes associated with the Housing Element Update is noted. Please see Master Response 7 in Section 3.2.

Response O-1.3

The comment commends the City and Los Angeles Housing + Community Investment Department (HCID) for a successful Housing Element Update and summarizes multiple facets of the Housing Element Update, in particular its econometric approach to estimating site capacity, its data-driven site inventory analysis, the findings from Fair Share Reports, and its goal to accommodate 220,000 more housing units through rezoning and land use reform. While the commenters note support for these facets, they raise concern regarding the Housing Element Update's consistency with state requirements, compliance with Assembly Bill 686, and detailed implementation plan for the Rezoning Program.

The commenter's summary of various components the Housing Element Update is noted. Please see Master Response 7 in Section 3.2.

Response O-1.4

The comment states various remaining concerns about the draft Housing Element Update, namely that portions of the Sites Inventory methodology are over-optimistic about the City's housing development potential without rezoning or major land use reforms, that the Housing Element Update should incorporate a higher buffer for site capacity above the lower-income RHNA Allocation, and that units subject to the Rent Stabilization Ordinance (RSO) should not be induced on the sites inventory.

The commenter's concerns regarding various components of the Housing Element Update are noted, but they do not raise any specific concern with the EIR. Please see Master Responses 4 and 6 in Section 3.2. The Housing Element Update is required to include rigorous analysis that demonstrates not only available zoned capacity, but also the likelihood of housing development under existing zoned conditions. Due to these State legal requirements, the City is unable to demonstrate adequate capacity and, therefore, must pursue a Rezoning Program to accommodate the shortfall.

Response O-1.5

The comment states various concerns related to the Rezoning Program described in the Housing Element Update, namely that the City's proposal for rezoning and land use reform lack specificity and detail as to their implementation, and that without these details, the Housing Element Update will not adequately comply with the requirements to affirmatively further fair housing (AFFH).

The commenter's concerns regarding the Rezoning Program are noted, but do not raise specific concerns with the adequacy of the EIR. Please see Master Responses 4 and 6 in Section 3.2. Additionally, as noted in Chapter 2, since the Draft EIR was circulated, the Housing Element Update has been revised to incorporate additional detail regarding implementation of the Rezoning Program and additional AFFH analysis of the sites inventory and Rezoning Program.

Response O-1.6

The comment urges the City to provide a thorough, detailed plan for rezoning, constraint removal, land use reform, and their overall implementation as part of the final Housing Element Update. The comment suggests that a credible plan for equitably achieve the RHNA would include committing to the creation of 306,000 housing units by 2029 through the Project's rezoning and land use reform programs, implementing a comprehensive Fair Share approach to the RHNA Rezoning Program, increasing affordable housing opportunities in high-opportunity neighborhoods, avoiding relying on CPAs for implementation of the RHNA Rezoning Program, expanding and merging the Transit Oriented Communities (TOC) Program and the City's Density Bonus program, implementing a strong citywide constraint removal program, and

identifying parcels that the Rezoning Program would target as part of the final Housing Element Update. In addition, the commenter suggests that, due to the age of the City's Framework Element, it is out of date, therefore relying on outdated forecasts of future neighborhood population growth and setting artificial caps on housing production in many neighborhoods. Therefore, the commenter suggests that the Housing Element Update should commit to updating the City's Framework Element by 2024 or abolishing it altogether.

The commenter's suggestions regarding various components of the Housing Element Update are noted but they do not raise specific issues with the EIR analysis or conclusions. The City is not required to consider changes to the Proposed Plan in the EIR unless the commenter supports that the changes will avoid significant impacts. Please see Master Response 6 in Section 3.2. Additionally, as noted in Chapter 2, since the Draft EIR was circulated, the Housing Element Update has been revised to include a detailed list of potential candidate sites for rezoning.

Furthermore, the Framework Element explicitly does not act as a limit or barrier to additional housing capacity in the City's Land Use Element (Community Plans). The Framework Element is the General Plan's overarching land use policy document, which provides guidance for how the City plans for growth. It provides direction to focus future housing growth in Regional Centers, near high quality transit, and in areas near jobs. The population forecasts provided in the Framework Element do not limit future growth. The Community Plans utilize the population forecasts from the RTP/SCS when planning for additional growth, consistent with the population forecasts incorporated in the RHNA Allocation.

Response O-1.7

The comment states that the City has a legal obligation to sufficiently plan to meet current and future residents' housing needs in an equitable manner and adds that, based on the issues highlighted in the letter, the City has not yet offered a plan as to how to meet their legal obligation. The comment states that the City risks rejection of the Housing Element Update and decertification by the California Department of Housing and Community Development (HCD) if it does not adequately meet the legal requirements to affirmatively further fair housing.

The purpose of the Housing Element Update is to meet the City's fair share of the regional housing need to accommodate projected population growth and meet existing housing needs in the City in accordance with the RHNA and per State law; increase the availability of affordable housing and the variety of housing options within the city; and strengthen the City's goals, policies, objectives and programs that prevent displacement, promote homeless prevention and diversion, and promote housing stability. The commenter's concern about possible rejection of the Housing Element by HCD is noted but does not raise

issues on the adequacy of the analysis or conclusions in the EIR. Please see Master Response 1 and 7 in Section 3.2. Additionally, as noted in Chapter 2, the City received comments from HCD on September 3, 2021. A comprehensive updated Draft Housing Element Update was released on September 15, 2021 which included modifications to respond to HCD comments and ensure compliance with state Housing Element requirements.

LETTER O-2

COMMENTER: Robert Apodaca, Vice-Chair, Director of Public Policy
The Two Hundred

DATE: August 6, 2021

Response O-2.1

The comment summarizes the history of The Two Hundred and summarizes the group's lifework.

The commenter's summary of their organization and groupwork is noted.

Response O-2.2

The comment discusses California's severe housing, summarizes state Housing Element requirements to affirmatively further fair housing, as established by AB 686, and explains how jurisdictions across the state have historically adopted policies that constrain housing supply and result in racial segregation.

The commenter's summary of the housing shortage and the need for AFFH requirements is noted, but do not raise issues with the adequacy of the analysis or conclusions in the EIR. Please see Master Response 4 in Section 3.2.

Response O-2.3

The comment requests that civil rights legal violations, including the former practice in which cities and counties adopted policies that constrained the housing supply, be corrected in the City's Housing Element Update and Rezoning Program. The comment identifies the "worst offenders" against civil rights housing laws in jurisdictions across the state and provides suggestions for practical solutions so that the City does not adopt a General Plan Update or Rezoning Program that would continue to violate civil rights.

The commenter's requests for changes to the Housing Element Update and Rezoning Program are noted, but do not raise issues with the adequacy of the analysis or conclusions in the EIR. Please see Master Response 4 and 6 in Section 3.2. Nonetheless, the Housing Element Update would not violate civil rights as its purpose is to meet the City's fair share of the regional housing need to accommodate projected population growth and meet existing housing needs within the city in accordance with the RHNA and per State law, including AB 686; increase the availability of affordable housing and the variety of housing options within the city; and strengthen the City's goals, policies, objectives and programs that prevent

displacement, promote homeless prevention and diversion, and promote housing stability. Please see Master Response 1 in Section 3.2.

Response O-2.4

The comment asks that the City plan housing for people, build diverse and inclusive communities, and adopt the right Housing Element Update and Rezoning Program. The comment provides contact information in the event the City would like to discuss these topics further.

The commenter's requests regarding the Housing Element Update and Rezoning Program are noted, but do not raise issues with the adequacy of the EIR. Please see Master Response 4 in Section 3.2. Nonetheless, the purpose of the Housing Element Update is to meet the City's fair share of the regional housing need to accommodate projected population growth and meet existing housing needs within the city in accordance with the RHNA and per State law; increase the availability of affordable housing and the variety of housing options in the City; and strengthen the City's goals, policies, objectives and programs that prevent displacement, promote homeless prevention and diversion, and promote housing stability. Please see Master Response 1 in Section 3.2.

LETTER O-3

COMMENTER: Laura Raymond, Director
Alliance for Community Transit - LA

DATE: August 19, 2021

Response O-3.1

The comment provides a description of the Alliance for Community Transit – LA (ACT-LA), their mission to uplift communities, and a description of the communities the coalition serves. The comment notes that the City should engage with these communities in order to center their concerns with the draft Housing Element and the Rezoning Program.

The commenter's summary of their organization and mission is noted.

Response O-3.2

The comment states the need to tie on-site affordable housing requirements to rezoning and identifies their top three recommendations for the Rezoning Program: 1) Design the Rezoning Program to include on-site affordable housing requirements that exceed TOC program standards on every site that is rezoned, and include displacement avoidance and protection measures such as excluding tenant-occupied sites from rezoning; 2) Expand the City's affordable housing incentive programs to create mixed-income and 100 percent affordable housing in communities in the California Tax Credit Allocation Committee (TCAC) high and highest opportunity areas, while subtracting census tracts that have a displacement risk; and 3) Enforce the Measure JJJ requirement that community plan updates do not reduce the capacity for creation and preservation of affordable housing or undermine California Government Code Section 65915 or any other affordable housing incentive program by requiring that all increases in allowable density and floor area ratio (FAR) be aligned with on-site affordable housing standards that meet or exceed TOC.

The commenter's recommendations for the Rezoning Program are noted, but do not raise issues with the adequacy of the EIR. Please see Master Response 6 in Section 3.2.

LETTER O-4

COMMENTER: Philip Armstrong, President
Rampart Village Neighborhood Council
155 N Occidental Boulevard, Suite 236
Los Angeles, CA 90026

DATE: August 20, 2021

Response O-4.1

The comment identifies items considered in the Rampart Village Neighborhood Council (RVNC) August 17, 2021 agenda, which included a proposal to change the Housing Element Update to incorporate the goal of 100 percent retention of affordable housing units showing as expiring, and revise Policy 4 of Chapter 6 of the Housing Element Update so that instead of "study barriers to the greater utilization of shared ownership models," the objective would be to "implement the greater utilization of shared ownership models" since ample evidence is available to support the use of shared ownership models. The comment lists information that was relied upon in consideration of their agenda items and notes that, on July 25, 2021, the RVNC committee voted in favor of incorporating the goal of 100 percent retention of affordable housing units showing as expiring; and implementing the greater utilization of shared ownership models.

The comment's summary of agenda items related to the Housing Element Update that were topic of discussion and approval in previous RVNC meetings is noted, but does not raise issues with the adequacy of the EIR. Please see Master Response 6 in Section 3.2.

LETTER O-5

COMMENTER: Elizabeth Campos Layne, President
Del Rey Residents Association

DATE: September 1, 2021

Response O-5.1

The comment provides a brief description of the Del Rey Residents Association (DRRA), the neighborhood of Del Rey, and those agencies responsible for Del Rey's creeks.

The commenter's description of their association, neighborhood, and those responsible for Del Rey's creeks is noted.

Response O-5.2

The comment states that the Safety Element must address evacuation problems during power failures or as a result of floods, fires, or earthquakes and adds that Del Rey is in a flood plain, tsunami zone, and adjoins the gas storage fields and related facilities in Ballona Wetlands. The comment references prior incidents related to flooding and the Aliso Canyon gas incident, and asks several questions related to these topics.

The commenter's requests regarding the Safety Element Update are noted, but do not identify or raise any issues on the adequacy of the EIR. See Master Response 4 in Section 3.2. Nonetheless, the Safety Element notes that the City has developed a dynamic approach to evacuation response to various threats across different and diverse areas. Evacuation routes are pre-selected and mapped, but which route is utilized will vary according to the emergency type and location. Some routes are signed, such as tsunami evacuation routes in the city's coastal areas. However, fire or flood events are more unpredictable and response varies as to those precise locations and routes. During an emergency, several departments, including Los Angeles Fire Department (LAFD), Los Angeles Police Department (LAPD), and Los Angeles Department of Transportation (LADOT), have established procedures to notify residents of the correct evacuation route and direct traffic to ensure a safe evacuation. NotifyLA is one alert notification program that the City has established to aid in safe evacuation. Additionally, programs like Ready Your Los Angeles Neighborhood (RYLAN) encourage citizen participation in emergency response procedures, including becoming more familiar with evacuation protocols and coordinating with neighbors to ensure effective execution. Evacuation plans are updated and maintained to respond to different emergencies and to coordinate among all agencies involved in response. Chapter 2 (Existing Conditions, Hazard Issues and

Mitigation History) of the Safety Element Update has been updated to refer readers to these related resources.

A complete copy of the Local Hazard Mitigation Plan, which includes maps and figures, is included in the Staff Recommendation Report for the Safety Element Update as Exhibit H and has been posted on the Emergency Management Department website, here: https://emergency.lacity.org/la-hazards/about-hazard-mitigation-plan.

Response O-5.3

The comment disagrees that upzoning and density increases would alleviate homelessness and agrees with funding permanent supportive housing to keep people from falling into homelessness. The comment also references a prior letter submitted on the Palms/Mar Vista/Del Rey Community Plan Update, and asks that those comments and concerns be addressed.

The commenter's opinion is noted, but does not identify or raise issues on the adequacy of the EIR. Please see Master Response 1, 4, and 7 in Section 3.2. Nonetheless, the Housing Element Update includes objectives under Goal 5 (Preventing and Ending Homelessness) that aim to prevent homelessness and rehouse homeless individuals. Please see Response O-5.6 for a response to the concerns raised in the comment letter submitted on the Palms/Mar Vista/Del Rey Community Plan Update.

Response O-5.4

The comment raises concerns regarding timing, and states that despite the Housing Element Update needing to be adopted by October 15, 2021, the draft site inventory has yet to specify parcels for rezoning. The comment adds that the Housing Element Update is being reviewed prior to completion of the update to the Palms/Mar Vista/Del Rey Community Plan and adds that the effects of COVID-19 on housing needs, infrastructure adequacy, existing zoning and allotment of new units, traffic, parking, overcrowding, and general quality of life should be addressed in the Housing Element Update.

While the initial draft of the Housing Element Update (released on July 1, 2021) included details on the proposed Rezoning Program, including strategies and anticipated geographic areas where rezoning is anticipated, the initial draft did not include the inventory of potential sites for rezoning because it was not yet completed. As described in Chapter 2, the revised Housing Element Update (released on September 15, 2021) included additional details on each of the proposed rezoning strategies as well as Appendix 4.7 (Inventory of Candidate Sites for Rezoning). Appendix 4.7 was added to the City's webpage for the Housing Element Update under the "Draft Plan" tab on September 15, 2021: https://planning.lacity.org/plans-policies/housing-element-update#draft-plan. The Inventory of Candidate

Sites for Rezoning lists many more sites and potential units than are necessary to satisfy the RHNA requirements. This expansive approach is purposeful to allow the flexibility for future refinement of the rezoning strategies and sites. As such, sites included on the list should be considered as potential sites for rezoning consideration, not a final list of sites that will be rezoned. Other sites may be added, and listed sites may be removed or amended. A public review process will help guide future recommendations as to which sites are rezoned at which densities, but should follow the Housing Element's objective of an equitable rezoning program that furthers fair housing goals. While the revised draft provides additional information on the individual strategies encompassed under the Rezoning Program, and includes a list of potential candidate sites, this information is consistent with the description the Rezoning Program provided in the Draft EIR, in particular with regard to geographic focus and types of strategies.

The commenter's request to add information regarding to the Housing Element Update is noted, but does not raise issues on the adequacy of the EIR. Please see Master Response 6 in Section 3.2.

Response O-5.5

The comment states that the Housing Element Update should include an assessment of the number of units already allowed by the City's existing zoning. In other words, the existing "allowance" from prior rezoning should be available to offset the "shortfall" from prior years. The comment states that, per the Initial Study to the Draft EIR (Appendix A of the Draft EIR), the current calculation of the required RHNA includes not only the current eight-year projection (as in prior cycles) but also 100 percent of the cumulative shortfall from prior years. The comment notes that this is the first Housing Element to include this calculation and suggests that, instead of putting 100 percent of the shortfall into this cycle, the shortfall should be spread over several cycles.

The commenter's request for changes to the RHNA is noted, but does not raise issues related to the adequacy of the EIR. Please see Master Response 6 in Section 3.2. As described in the Project Description (Section 3 of the Draft EIR), the Adequate Sites Inventory was drafted in compliance with requirements in State law, and the Rezoning Program is required to accommodate the RHNA.

Response O-5.6

The comment includes a letter dated September 14, 2020, with general comments, notes, and missing information on the Draft Land Use Concepts for the Mar Vista/Palms/Del Rey Westside Community Plan with the intent that the same raised issues be addressed in the Housing Element Update and the Safety Element Update.

The attached letter is noted, but is specific to the Draft Land Use Concepts for the Mar Vista/Palms/Del Rey Westside Community Plan and does not raise issues on the adequacy of the EIR. Please see Master Response 6 in Section 3.2.

LETTER O-6

COMMENTER: Michelle A. Bisnoff, Chairperson
Brentwood Community Council

DATE: September 6, 2021

Response O-6.1

The comment summarizes who the Brentwood Community Council (BCC) are and states that the comments provided in their letter are based upon a review by the BCC Land Use Committee, other stakeholders, and the larger Brentwood community.

The commenter's summary of their organization and brief introduction to their letter are noted. Please see Master Response 7 in Section 3.2.

Response O-6.2

The comment asserts that, without certain missing information provided sufficiently in advance of the deadline for public comment, the environmental review process for the Housing Element Update is flawed and unlawful. The comment adds that, at the time the draft Housing Element Update was posted for review, Appendix 4.7 (i.e., Inventory of Candidate Sites for Rezoning) to the Housing Element Update was still incomplete and missing and, therefore, the EIR is deficient in that it was unable to analyze environmental impacts based on the actual allocation of the housing units among the City's various neighborhoods. The comment requests that the Draft EIR be revised once the allocation of housing units is completed.

While the Draft EIR included a description and analysis of the Rezoning Program, Appendix 4.7 to the draft Housing Element Update was not initially included in the July 1, 2021, online posting of the Housing Element Update for public review and comment because it took time to collect the relevant information to compile the list of sites based on initial public feedback. However, Appendix 4.7 was added to the City's webpage for the Housing Element Update under the "Draft Plan" tab on September 15, 2021: https://planning.lacity.org/plans-policies/housing-element-update#draft-plan. As described in Chapter 2, while the revised draft provides additional information on the individual strategies encompassed under the Rezoning Program, and includes a list of potential candidate sites, this information is consistent with the Rezoning Program described and analyzed in the Draft EIR, in regard to the geography subject to the Rezoning Program and types of strategies proposed.

Furthermore, the commenter does not provide an explanation or supporting evidence as to how the subsequent availability of Appendix 4.7 resulted in a deficient Draft EIR. As drafted, the EIR adequately analyzes the potential impacts on the environment resulting from the Proposed Project, identifies the significant impacts, and describes feasible mitigation measures that could minimize significant adverse impacts. In addition, the Rezoning Program will be subject to further refinement through a public participation process prior to October 2024.

Response O-6.3

The comment states that the draft Housing Element Update and Draft EIR are missing 2020 Census information that would allow for a more accurate analysis regarding projected needs. The comment states that, while the Draft EIR may provide a conservative review of environmental impacts using higher demographic numbers, the draft Housing Element is providing for an unnecessary housing and upzoning increase. Additionally, the comment states that, with lack of information as to where actual upzoning would occur, there is no control as what properties would be upzoned and the Housing Element Update could create a situation where one CPA bears an unfair share of increased density. The comment adds that the Draft EIR does not address Project impacts by CPA and that the mitigation measures included in the Draft EIR would only apply to discretionary projects and would not be applicable once a property is upzoned. The comment suggests that mitigation measures should be required to any parcel that is upzoned to accommodate the RHNA allocation.

The purpose of the Housing Element Update is to meet the City's fair share of the regional housing need to accommodate projected population growth and meet existing housing needs within the city in accordance with the RHNA and per State law. The Housing Element Update is required to plan for the RHNA Allocation, which reflects the number of housing units needed to meet existing need and accommodate projected need. Under the RHNA allocation, the City is required to provide the zoned capacity to accommodate the development of at least 456,643 residential units during the planning period. The City has no authority to adjust the RHNA for any reason, including the release of the Census. Please see Master Response 1 in Section 3.2.

As discussed in Section 3, *Project Description*, of the Draft EIR, a Project objective is to encourage concentrated housing growth in High and Very High Resource areas and in areas with good access to jobs, services, and high-quality public transit all throughout the city. Therefore, it is not reasonably foreseeable that one CPA would bear an unfair burden of increased density. As discussed in Section 3, *Project Description*, of the Draft EIR, the EIR analyzes the construction and operation of 420,327 housing units, which is intended to provide a conservative analysis of the "worst-case" scenario of environmental impacts from implementation of the Housing Element Update through 2029. As drafted, the EIR adequately

analyzes the potential impacts on the environment resulting from housing development accommodated by the Proposed Project, identifies the significant impacts, and describes feasible mitigation measures that could minimize significant adverse impacts. The Draft EIR determines numerous impacts to be significant and unavoidable since identified mitigation measures would only apply to discretionary projects by State law, not ministerial (or "by right") projects. The commenter's request to apply the mitigation measures on ministerial projects are subject to the City Council in approving the Proposed Plan. Nothing in the comment supports the need for new analysis or conclusions in the EIR.

Please see Master Response 5 in Section 3.2.

Response O-6.4

The comment states that the Housing Element Update is based on an assumed RHNA number of needed housing units and then unnecessarily increases the target capacity number for lower income units by 10 percent above the RHNA and for moderate income units by 15 percent above the RHNA. The comment states that this additional target capacity (buffer) unnecessarily increases the number of units needing to be accommodated by the Rezoning Program, and notes that most jurisdictions in the state have worked to reduce their required zoning increase. The comment adds that, because an increase of residential units will have environmental impacts, the City should analyze the actual allocation of 456,643 housing units needed rather than 486,643 housing units.

The City included the buffer to meet state requirements. State law requires a sufficient buffer in the Inventory of Sites to accommodate future reductions in the sites identified for affordable housing as they are developed with another use during the eight-year cycle, or the jurisdiction could be required to conduct further rezoning during the planning period if insufficient sites are available for housing. To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required. The buffer is needed to ensure that the jurisdiction can meet the RHNA, which as noted is the build out of the RHNA allocation of 456,643 units. Therefore, the Housing Element Update is adequately providing for an additional buffer of housing units based on the anticipated need for additional capacity. In consideration of this buffer, the EIR analyzes the construction and operation of 420,327 housing units to provide a conservative analysis of the "worst-case" scenario of environmental impacts and identify and significant impacts from implementation of the Housing Element Update through 2029. Please see Master Response 1 and 6 in Section 3.2.

Response O-6.5

The comment notes that the Housing Element Update does not consider any undeveloped site in a Very High Fire Hazard Severity Zone (VHFHSZ) as a potential site for any "by right" development as part of the Inventory of Adequate Sites for Housing and states that counting such sites would increase the amount of available housing sites and decrease the number of units needed to be made available through upzoning. The comment adds that it is critical that the Rezoning Program not include parcels located in VHFHSZs and requests that the Housing Element Update be modified to make this point clear.

The commenter's suggestion to consider undeveloped sites in VHFHSZ to decrease the number of units needed to be made available through upzoning is noted, but does not raise issues with the adequacy of the EIR. Please see Master Response 6 in Section 3.2. Nonetheless, as discussed in Section 4.17, *Wildfire*, of the Draft EIR, the Rezoning Program will prioritize areas near transit, jobs, and in High and Very High Resource Areas; no rezones in environmentally sensitive areas such as the VHFHSZs are proposed. Furthermore, the Rezoning Program will still undergo a separate environmental review process once completed by 2024.

Response O-6.6

The comment states that the Draft EIR is inadequate if it analyzed an increase in zoning under the Rezoning Program without having had available upzoning data.

See Response 0-6.2.

Response O-6.7

The comment requests that Section 4.9, *Land Use and Planning*, of the Draft EIR analyze impacts of the Housing Element Update upon each of the City's 35 CPAs and states that the significance of Project impacts would be solely based on the actual location of increased density within each CPA, as they vary from one another. The comment adds that the lack of specific allocation of housing units throughout the city renders the analyses in the Draft EIR meaningless.

As discussed in Section 3, *Project Description*, of the Draft EIR, the EIR analyzes the Proposed Plan (including the Rezoning Program)--the citywide construction and operation of 420,327 housing units. The analysis provides a conservative analysis of the "worst-case" scenario of environmental impacts from implementation of the Housing Element Update through 2029. As drafted, the EIR adequately analyzes the potential impacts on the environment resulting from housing development accommodated by the

Proposed Project, identifies the significant impacts, and describes feasible mitigation measures that could minimize significant adverse impacts.

Response O-6.8

The comment quotes page 4.9-29 of the Draft EIR, which states that the Rezoning Program would be subject to applicable City regulations, environmental review processes, and Regulatory Compliance Measures. The comment states that, if the increased density is accomplished via upzoning, then such increases would be considered "by right" and would not require subsequent review when those parcels are developed. The comment requests that the quoted statement be removed from the Draft EIR or that text be added to explain if there is subsequent CEQA review and protection available to the community.

Upzoning, or the act of rezoning land with a greater allowed development capacity, is done through a zoning ordinance. Zoning ordinances as legislative acts are discretionary, not by-right, and require environmental review. The commenter has not provided any substantial evidence or identified any specific issue that requires new analysis or conclusions in the EIR.

Response O-6.9

The comment summarizes analysis related to construction noise impacts in Section 4.10, *Noise*, and questions how the mitigation measures would be implemented upon higher density projects once upzoning is assigned, since developments on rezoned parcels would be considered "by right" and not "discretionary." The comment requests that the Draft EIR address all projects that would benefit from upzoning in addition to discretionary projects.

The Draft EIR at pages 4.10-35 discloses that construction noise is one of the more common reasons housing development in the City, especially larger projects, have significant unavoidable impacts. Additionally, without implementation of mitigation measures, significant impacts from construction noise could result from the development of housing projects. A review of the case studies looked at in the EIR, found that of the 54 projects, 18 large multi-family residential developments and mixed-use developments with residential uses had significant unavoidable impacts. (Draft EIR at 4.10-28). The Draft EIR at page 4.10-37 discloses that even with mitigation some larger projects could have significant impacts. Based on the above, the EIR discloses that projects that some projects that do not have mitigation for construction noise will have significant impacts. The comment does not raise an inadequacy or other issue with the Draft EIR analysis of construction noise and mitigation. The comment will be included in the administrative record for consideration by the City Council in consideration of the Proposed Plan.

Response O-6.10

Relating to Section 4.10, *Noise*, of the Draft EIR, the comment states that, without the specific allocation of housing units throughout the city, it is unreasonable for the Draft EIR to assume that traffic noise resulting from increased traffic volumes does not require an analysis.

The traffic noise analysis is included in Section 4.10, *Noise*, of the Draft EIR under Threshold 4.10-2. As analyzed therein, the overall increase in traffic noise from the project was estimated using VMT analysis prepared by Fehr & Peers for existing conditions (Year 2021), future without project conditions (i.e., Year 2029 without the Housing Element Update), and future with project conditions (i.e., Year 2029 with the Housing Element Update). A doubling of the traffic noise source would result in a 3 dBA increase, which would be a perceptible increase in traffic noise. Off-site project noise (i.e., roadway noise) would have a significant impact if permanent ambient noise level measured at the property line of affected uses increases by 3 CNEL to or within the "normally unacceptable" or clearly unacceptable" categories, as shown in the City's noise compatibility guidelines shown in Table 4.10 7, or any 5 CNEL or more increase in noise level. Although a four percent or more increase in traffic may occur at local level in areas where substantial new housing is proposed, the Project would not double traffic resulting in a perceptible increase in noise based on the citywide increase of four percent. Therefore, the Draft EIR concludes that off-site traffic noise impacts would be less than significant. See Master Response 5 in Section 3.2.

Response O-6.11

Relating to Section 4.11, *Population and Housing*, of the Draft EIR, the comment states that the draft Housing Element Update and EIR use inaccurate population data since they both state that the 2020 Census data is not yet available and clarifies that the data is available. The comment requests that the Draft EIR be updated with recent Census data and re-circulated for public review. The comment adds that, once integrated, the Census data should be analyzed with respect to each CPA and that the application of the Housing Element Update to each CPA should be done consistently regardless of the status of their respective Community Plan updates.

The Census numbers show the less than one percent change in the numbers used in the EIR. As discussed in Chapter 2 of the Final EIR, there is no need to update the EIR based on the Census data. Comments on updating the Community Plans will be included in the administrative record for consideration by the City Council in approving the Proposed Plan.

Response O-6.12

With respect to Section 4.12, *Public Services*, of the Draft EIR, which discusses fire services, the comment states that, without the specific allocation of housing units in each CPA throughout the city, the Draft EIR is not able to provide a meaningful analysis of the increased burden on existing fire safety measures or on sufficient mitigation measures with respect to additional response units or facilities. The comment adds that adoption of the Proposed Project cannot proceed without the "Reports" called for by the City Council's adoption of the Motion in Council File 20-1213 regarding the inter-relationship of evacuation routes and increased development.

As drafted, the EIR adequately analyzes the potential impacts on the environment resulting from the construction and operation of 420,327 housing units accommodated by the Proposed Project, identifies the significant impacts, and describes feasible mitigation measures that could minimize significant adverse impacts. Furthermore, Section 4.12, *Public Services*, of the Draft EIR, evaluates the environmental impact associated with the provision of fire protection services (e.g., noise from construction and operation of a fire station) and not the environmental impacts to current fire protection services. As stated under Threshold 4.12-1 of Section 4.12, the Project would have a significant impact related to fire protection services if it would "Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services."

As discussed in Section 4.12, *Public Services*, of the Draft EIR, forecasted growth being accommodated by the Housing Element Update would increase demand for fire protection service in the city, which could result in the need for new or expanded fire protection facilities. It is foreseeable that new or expanded fire stations could be built without creating significant environmental impacts since new facilities would be of limited size and scale; however, the Draft EIR acknowledges that site specific conditions for these facilities are not known and future mitigation may prove infeasible resulting in a significant and unavoidable impact at this level of review. Nonetheless, the Draft EIR identifies Mitigation Measures 4.12-1(a) through 4.12-1(d), which would reduce demands on LAFD for fire protection services.

Please see Master Response 5 in Section 3.2.

Response O-6.13

With respect to the analysis of police services in Section 4.12, *Public Services*, of the Draft EIR, the comment requests that the Draft EIR reanalyze impacts relating to police protection and offer mitigation measures on a project-by-project basis rather than assume that safety concerns would be addressed through the

building permitting process for projects less than 10 acres in size or with less than 300 residential units. The comment adds that a listing of safety measures should be developed and offered as a mitigation measure.

Section 4.12, *Public Services*, of the Draft EIR, evaluates the environmental impact associated with the provision of police protection services (e.g., noise from construction and operation of a police station) and not the environmental impacts to current police protection services. As stated under Threshold 4.12-2 of Section 4.12, the Project would have a significant impact related to police protection services if it would "Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services." Therefore, the analysis is not focused on impacts related to crime and safety, since these topics are social concerns to be addressed outside the CEQA process. See Master Response 3 in Section 3.2.

As discussed in Section 4.12, *Public Services*, of the Draft EIR, 54 housing development projects in the city were reviewed for impacts associated with police protection services. Of the 54 projects reviewed, nine large projects were found to require mitigation measures related to Police Services to reduce impacts to a level of less than significant. Projects less than 10 acres in size or with less than 300 residential units were found to have less than significant impacts to police services as their proposed development would result in a minimal population increase, allowing the nearest existing police stations to adequately serve these projects. However, the Draft EIR acknowledges that build out of the RHNA to accommodate existing need and planned growth will foreseeably result in the need for new or expanded police facilities, which may be based on site-specific conditions. The Draft EIR identifies mitigation measures 4.12-2(a) and 4.12-2(b), which include the review of design plans and ensuring adequate emergency access during construction and demolition, and may be needed for larger residential and mixed-use projects with hundreds of units to ensure that adequate police protection services are provided. The commenter provides no substantial evidence to support the need for mitigation on projects smaller than 10 acres or 300 residential units or that any such mitigation would reduce the identified significant impact resulting from construction of new facilities to respond to the demand of the build out of the RHNA. Based on the above, no further response is necessary and no addition or correction to the EIR is required.

Response O-6.14

With respect to the analysis of school facilities in Section 4.12, *Public Services*, of the Draft EIR, the comment states that the Draft EIR does not address the varying impacts of increased enrollment upon schools, particularly by CPA. The comment adds that the EIR should analyze the impact of additional school

construction and the impact upon the City's education system if increases in housing and population in an area significantly precedes the construction of additional school facilities in schedule.

The commenter's request that the Draft EIR analyze increased school enrollment impacts by CPA is noted, but does not pertain to the adequacy of the Draft EIR. Section 4.12, *Public Services*, of the Draft EIR, evaluates the environmental impact associated with the provision of school facilities and services (e.g., construction of new or physically altered school facilities) and not the impacts to the education system. As stated under Threshold 4.12-3 of Section 4.12, the Project would have a significant impact related to school facilities and services if it would "Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public schools." Therefore, the analysis is not focused on impacts related to the education system, since these topics are social concerns to be addressed outside the CEQA process. See Master Response 3 in Section 3.2.

As discussed in Section 4.12, *Public Services*, of the Draft EIR, new schools in particular locations could result in potentially significant impacts; however, such impacts are too speculative to assess without information as to design, location, and proximity to the population to be served. Of the 54 projects reviewed, no project was found to have significant and unavoidable impacts to schools and only one large project required mitigation measures which were to pay school fees required by law. In addition, all development would be subject to California Government Code Section 65995, which allows the Los Angeles Unified School District (LAUSD) to collect impact fees from developers of new residential and commercial development and may be used to pay for interim school facilities to house students generated by new development while permanent facilities are constructed. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less than significant level. Therefore, new development accommodated under the Proposed Project would assist in funding efforts necessary to alleviate school overcrowding and would pay its share of the cost of accommodating additional students.

Response O-6.15

With regard to Section 4.13, *Recreation*, the comment states that the City previously expanded the radius in which Quimby funds can be administered, resulting in the potential for funds to be used at a greater distance from where increased density is proposed. The comment requests that the Draft EIR consider whether decreasing the radius for deployment of Quimby funds would be a helpful mitigation measure.

As discussed in Section 4.13, *Recreation*, of the Draft EIR, the City has conducted studies like the *Citywide Community Needs Assessment* and the *Parks Condition Assessment Report* to address issues with recreational facilities and manage the status of current and future recreational facilities. However, due to the lack of available space to develop new parks to serve the anticipated population growth in dense urban areas of the City, feasible mitigation beyond the policies and initiatives included in current City policies/programs and the Housing Element Update to enhance recreational opportunities is not available. Therefore, this impact would be significant and unavoidable. Nonetheless, upon their next review of the fee program and outside the CEQA process, the City will consider improvements to the program that governs the manner in which Quimby funds can be administered within the City. The commenter does not provide substantial evidence to support that decreasing the radius for deployment of Quimby funds would help mitigate the identified significant impact. To the extent that the EIR identified significant impact to Citywide parks from the build out of the RHNA, it is reasonable to assume that the more options the City has for the use of the Quimby fees the more it would be able to address impacts to parks. There is no basis to find, and the commenter has provided none, that reducing the locations such funds could be used would improve the City's ability to address park deficiencies. Based on the above, no further response is necessary and no new analysis in the EIR is required.

Response O-6.16

The comment quotes page 4.14-52 of the Draft EIR, which describes the Rezoning Program as it relates to the Transportation analysis in Section 4.14, and requests that the transportation analysis in the Draft EIR be updated to address impacts based on the actual locations for upzoning and facts rather than "likely" scenarios, such as the Rezoning Program "likely" being accomplished via the City's Community Plans, an update to the City's Density Bonus program, zone changes, updates to specific plans or overlays, or other zoning ordinances.

As discussed in Section 3, *Project Description*, of the Draft EIR, a Project objective is to encourage housing growth in High and Very High Resource areas and in areas with good access to jobs, services, and high-quality public transit all throughout the city. Nonetheless, the Draft EIR is a programmatic document that addresses the citywide impacts of adopting and implementing the Proposed Project. The EIR analysis considers the likely locations of new housing development based on reasonable assumptions, but the actual locations of new development cannot be known with certainty at this stage of planning. No further response is required and no change to the analysis or conclusions in the EIR is required.

Response O-6.17

The comment states that mitigation measures provided in the Draft EIR with respect to Section 4.14, *Transportation*, address temporary impacts of construction but do not address permanent impacts of increased construction. The comment adds that mitigation measures only target discretionary projects and misses the point that upzoned properties under the Housing Element Update would qualify as "by right" projects, and would subsequently not be subject to the same mitigation measures.

While the Draft EIR found that the Housing Element Update would not result in transportation-related impacts as they relate to VMT, mitigation measures included in the Draft EIR address permanent impacts of construction in addition to temporary impacts, as they relate to potential transportation impacts. This includes Mitigation Measure 4.14-2 (Transportation Demand Management Program) which would reduce VMT impacts for individual discretionary projects that exceed the project threshold, in addition to Mitigation Measure 4.14-1 (Construction Management Plan) which addresses the potential construction-related impacts to the circulation system for discretionary projects. With implementation of Mitigation Measures, the Draft EIR determines that impacts related to transportation would be less than significant, with the exception of impacts related to highway safety as a result of design features or incompatible uses, which was found to be significant and unavoidable.

The commenter does not provide substantial evidence to support the need for mitigation for the "permanent impacts of increased construction." No further response is necessary and no change to the analysis or conclusions in the EIR is required. As to the commenter requesting the mitigation measures should be required for by right projects on upzoned sites, the comment is in the administrative record for the consideration of the City Council in the consideration of the Proposed Plan. The commenter has not identified an insufficiency or other issue with the EIR. No further response is necessary and no change to the analysis or conclusions in the EIR is required.

Response O-6.18

The comment states that the Draft EIR does not address transportation issues that would be exacerbated in communities with pre-existing intersections with "D" or "F" level of service (LOS) ratings, and for which no mitigation measures would be sufficient. The comment adds that the Draft EIR needs to 1) identify neighborhoods whose traffic conditions are already at unacceptable LOS and address how those neighborhoods would accommodate increased density when they cannot accommodate existing density; and 2) analyze and disclose intersections that would drop to an "F" LOS as a result of upzoning, particularly during peak traffic hours.

As discussed in Section 4.14, *Transportation*, of the Draft EIR, Senate Bill 743 states that "automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion within a transit priority area, shall not support a finding of significance pursuant to this division," and the Office of Planning and Research finalized a new section, 15064.3, to describe specific elements for considering the transportation impacts of a given project given the use of VMT as the primary measurement which was applied statewide beginning on July 1, 2020. Therefore, an analysis focused on LOS impacts would bear no contribution to determining a project's environmental impacts to transportation. The City has no authority to mitigate LOS "impacts" under CEQA. Therefore, as drafted, the analysis in Section 4.14 of the EIR is consistent with the intent of Senate Bill 743 and the requirements of CEQA.

Response O-6.19

The comment states that the Draft EIR does not address the quality of the existing utility infrastructure system in the city or identify those areas in the city where the infrastructure is not accommodating existing demand and experiencing regular lapses in service (e.g., water main breaks, power outages). The comment adds that the Draft EIR does not analyze each CPA's utility infrastructure system and requests that these deficiencies be corrected in the Draft EIR such that there is meaningful information to determine locations for upzoning or to create a plan to upgrade existing utilities prior to upzoning.

As discussed in Section 4.16, *Utilities and Service Systems*, of the Draft EIR, the analysis of the Housing Element Update's impacts with respects to utility infrastructure focuses on whether existing and projected infrastructure capacities or supplies would be sufficient to meet future demands associated with forecast development. With the exception of Threshold 4.16-3, the impact is whether construction of new or relocated facilities would result in environmental impacts. Please see Master Response 5 in Section 3.2. The commenter's request that the Draft EIR analyze utility infrastructure by CPA is noted, but does not pertain to the adequacy of the Draft EIR. A reasonable approach to the analysis in the Draft EIR was arrived upon based on the geographic area of study. The Draft EIR is a programmatic document that considers the citywide impacts of adopting and implementing the Housing Element Update. Please see Master Response 4 in Section 3.2.

Response O-6.20

With respect to Section 4.17, *Wildfire*, of the Draft EIR, the comment quotes page 4.17-36 of the Draft EIR and agrees that it would be problematic to have any upzoning occur in VHFHSZ or in State Responsibility Areas (SRA). The comment adds that explicit language ensuring no rezoning would occur in VHFHSZ or SRA was not found in the Housing Element Update and requests that such language be clearly included in the Housing Element Update if it is not already. The comment states that, should an increase in density

occur in a VHFHSZ or SRA via the Rezoning Program, then the Draft EIR would be required to reanalyze impacts related to wildfire.

As discussed in Section 4.17, *Wildfire*, of the Draft EIR, the Rezoning Program will prioritize areas near transit, jobs, and in High and Very High Resource Areas; no rezones within environmentally sensitive areas such as the SRA and VHFHSZs are proposed. The request to modify the Housing Element Update to clarify this aspect of the Rezoning Program is noted, but does not identify or raise an issue with the adequacy of the EIR. Please note, as described in Chapter 2 of the Final EIR, that the description of the Rezoning Program (Program 121) in the draft Housing Element Update includes a statement that it will ensure protections for areas prone to wildfire risk, and no sites located in a VHFHSZ are listed on the Inventory of Candidate Sites for Rezoning (Appendix 4.7).

Response O-6.21

The comment states that the Safety Element Update mentions several fire safety hazards but applies to safety-related restrictions to mitigate these hazards. The comment requests that a policy be added to prohibit increased density (e.g., ADUs) and non-residential development, excluding "by right" zoning, in VHFHSZ due to the potential for added traffic congesting evacuation routes.

The commenter's request regarding adding a policy to the Safety Element Update to prohibit increased density and non-residential development, excluding "by right" zoning, in VHFHSZs is noted, but does not raise issues on the adequacy of the EIR. Please see Master Response 6 in Section 3.2. Nonetheless, please note, as described in Chapter 2, the Safety Element Update was revised based on comments received from CAL FIRE to incorporate a new Policy 1.1.8 to reflect the City's commitment to maintaining low density zoning designations in VHFHSZs and ensuring appropriate mitigations throughout hazard areas.

Additionally, as discussed in Section 4.17, *Wildfire*, of the Draft EIR, the Housing Element Update specifically excluded any VHFHSZ areas from the Inventory of Candidate Sites for Rezoning. In addition, a majority of the development accommodated under the Proposed Project would be targeted in high resource areas, which are often located in urban areas of the city that are adjacent to high quality transit and away from high fire-prone areas.

Response O-6.22

The comment summarizes wildfire hazards associated with the neighborhood of Brentwood and adds that increased density would also increase identified hazards.

The commenter's summary of specific wildfire hazards associated with the neighborhood of Brentwood is noted. As discussed in Section 4.17, *Wildfire*, of the Draft EIR, the Proposed Project specifically excluded any VHFHSZ areas from the Inventory of Candidate Sites for Rezoning. In addition, a majority of the development accommodated under the Proposed Project would be targeted in high resource areas, which are often located in urban areas of the city that are adjacent to high quality transit and away from high fire-prone areas.

Response O-6.23

With respect to Project Alternatives, the comment states the Draft EIR did not discuss, as one of its alternatives, how preparation of a Draft EIR by CPA and/or with upzoning information available early in the analysis would lead to different and perhaps better-informed results.

The commenter's request that the Draft EIR analyze impacts by CPA as one of the alternatives in the Alternatives chapter. Alternatives are alternatives to the project and not to the format or method of analysis in the EIR. (CEQA Guidelines 15126.6.) Please see Master Response 4 in Section 3.2.

Response O-6.24

The comment states several concerns regarding 1) missing materials that make the drafts of the Housing Element Update and EIR deficient, 2) the completion of the Rezoning Program being required by 2024 when some updates to Community Plans are well on their way to completion while others have not begun, and 3) the intent of the Housing Element Update to provide for upzoning in excess of what is required without an implementation plan, which would potentially result in some areas being more burdened than others.

See Responses 0-6.2 and 0-6.4

Response O-6.25

The comment provides a conclusion to the letter and requests that both the Housing Element Update and Draft EIR be updated as described in Comments O-6.1 through O-6.24, and in particular to 1) incorporate the 2020 Census data, 2) reflect the allocated locations for upzoning, and 3) address environmental impacts by the 35 CPAs, with the opportunity for the public to comment on the analyses by CPA. The comment also requests that the City prioritize the implementation of surplus City property in facilitating the absorption of the additional housing inventory projected to be needed under RHNA prior to allocating additional housing units to private property.

See Responses 0-6.2, 0-6.3, 0-6.4, 0-6.7. See Master Response 6.

LETTER O-7

COMMENTER: Christina Spitz, Secretary
Pacific Palisades Community Council

DATE: September 7, 2021

Response O-7.1

The comment introduces the letter and states the comments provided therein are based upon a review of the documents by the Pacific Palisades Community Council (PPCC) Executive Committee and the September 6, 2021, comment letter provided by the BCC as they share common concerns related to wildfire and evacuation hazards.

The commenter's introduction in noted. Because the commenter makes consistent reference to the comments presented in the letter provided by BCC on September 6, 2021 (i.e., Letter O-6 of this section), most concerns are already addressed under responses to Letter O-6. Rather than repeat the comment summaries and respective responses verbatim, responses O-7.2 through O-7.7 refer to specific responses from Letter O-6, as applicable.

Response O-7.2

The comment states that PPCC shares the same concerns and comments as BCC with respect to 1) presumed deficiencies in the draft Housing Element Update and EIR due to missing data, reflected in the BCC letter under the heading "The Draft EIR is deficient as the Draft Housing Element Update is Missing Critical Data," and 2) Section 4.9, *Land Use and Planning*, of the Draft EIR.

Please see Responses O-6.2, O-6.3, O-6.6, and O-6.7 in Letter O-6.

Response O-7.3

The comment states that the Brentwood-Pacific Palisades Community Plan (BPPCP) has not been scheduled for an update yet and they are still unaware of the City's land use and zoning plans for this area.

The comment is noted, but does not raise issues on the adequacy of the EIR. Please see Master Response 7 in Section 3.2.

Response O-7.4

The comment states that PPCC shares the same concerns and comments as BCC with respect to 1) Section 4.11, *Population and Housing*, of the Draft EIR, 2) Section 4.12, *Public Services – Fire*, of the Draft EIR, and 3) Section 4.17, *Wildfire*, of the Draft EIR.

Please see Responses O-6.11, O-6.12, and O-6.20 through O-6.22 in Letter O-6.

Response O-7.5

The comment expresses appreciation that the Draft EIR recognizes wildfire-related comments previously submitted by PPCC and that the Draft EIR states that VHFHSZ and areas vulnerable to sea level rise will be excluded from the Rezoning Program, even if they have overlap with growth areas and higher resource areas. The comment adds that 100 percent of Pacific Palisades is within the VHFHSZ and shares the same conditions as Brentwood, noted in issues b) – g) under the heading "4.17. Wildfire" in Letter O-6.

The comment is noted but does raise issues on the adequacy of the EIR. Please see Master Response 7 in Section 3.2 as well as Responses O-6.20 through O-6.22 in Letter O-6

Response O-7.6

The comment agrees with concluding sentence in the BBC comment letter regarding the prioritizing the use of surplus City property for affordable housing.

Please see Response O-25 in Letter O-6.

Response O-7.7

The comment requests that Pacific Palisades be excluded from the Rezoning Program.

The commenter's request is noted. Please see Master Response 6 in Section 3.2.

LETTER O-8

COMMENTER: Tony Gittelson
Livable Communities Initiative

DATE: September 7, 2021

Response O-8.1

The comment provides a description of The Livable Communities Initiative (LCI) and explains that the core of the LCI is to address the City's housing crisis by upzoning under-utilized commercial arterials to three- to five-stories while simultaneously transforming the street: slowing cars, adding wide sidewalks, landscaping, bicycle lanes, and transit options – making "complete streets." The comment adds that the city has "hundreds of miles" of down-zoned commercial arterials and that, by creating LCI Zones, the LCI would provide all residents with a safe way to live without requiring a car. The comment attaches draft language for a LCI program that they urge to be included in the Housing Element Update as an implementation program.

The commenter's description of the LCI is noted. Please see Master Response 6 in Section 3.2. Nonetheless, the Housing Element Update is aligned with the goals of the LCI and its comprehensive vision of mixed-income transit-rich corridors. The LCI comment letter acknowledges some overlap between many of the policies and programs in the Housing Element Update, particularly the "Opportunity Corridor" Rezoning Program strategy. Staff has also taken note of recent significant federal budget reconciliation bill additions that could provide funding for the type of strategic investments across housing, transit, infrastructure and sustainability called for by the LCI. Rezoning, including updates to Community Plans, present opportunities to plan for streetscape and mobility improvements that can complement new housing opportunities. To reflect the connection between housing and the public realm, Program 131 (Livable Communities) has been added to the proposed Housing Element Update, as reflected in Chapter 2 of the Final EIR.

Response O-8.2

The comment includes an attached proposal to include the LCI as a Housing Element Update program. The proposal details the LCI's goals and its relationship to existing Housing Element Update programs.

The attached proposal detailing the LCI is noted, but does not raise issues on the adequacy of the EIR. Please see Master Response 6 in Section 3.2. Nonetheless, program 131 (Livable Communities) has been added to the proposed Housing Element Update, as reflected in Chapter 2 of the Final EIR.

LETTER O-9

COMMENTER: Elizabeth Reid-Wainscoat, Urban Wildlands Campaigner
Center for Biological Diversity
660 S Figueroa Street, Suite 1000
Los Angeles, CA 90017

DATE: September 7, 2021

Response O-9.1

The comment expresses support of all goals included in the Housing Element Update and Safety Element Update and that the Rezoning Program excludes areas "within environmentally sensitive areas such as the SRA and VHFHSZs." The comment encourages that City to use the Proposed Project as an opportunity to ensure all future developments reflect these "smart growth principles," explaining that sprawl development significantly impacts native biodiversity and destroys natural lands. The comment urges for a more comprehensive approach to growth that addresses community health while preserving wildlife and habitat.

The commenter's support of all goals included in the Housing Element Update and Safety Element Update and that Rezoning Program's exclusion of VHFHSZs, as well as the commenter's suggestions for the Proposed Project are noted but do not raise issues on the adequacy of the EIR. Please see Master Response 7 in Section 3.2.

Response O-9.2

The comment summarizes suggestions for updating various Project policies and programs. The comment suggests the plan updates should include new policies and programs to: prohibit or limit new residential development in VHFHSZs, require proof of private insurance for a prospective property for all hazards before a permit to build is approved, include programs for home hardening against wildfire, and require adoption of the Wildlife Ordinance by the end of 2021. The comment also expresses support toward the Livable Communities Initiative proposal with respect to Program 121, and expresses opposition toward Program 55 which calls for implementation of CEQA streamlining measures.

The commenter's suggestion for updating various Housing Element policies and programs and support for Program 121 is noted. Please see Master Response 6 in Section 3.2.

Response O-9.3

The comment states that wildfire poses a significant threat to the region and the City's stated commitments to addressing the climate crisis, protecting habitat, safeguarding human health, and increasing access to open space. The comment adds that the Proposed Project could result in the placement of more homes, infrastructure, and roads in high fire-prone areas which could endanger more people; eliminate or impact native habitats and biodiversity; and increase potential ignition sources, risk of wildfires, and costs associated with fire suppression and damages. The comment cites several reports related to development and wildfire risk, and states that placing new development in recognized fire-prone areas and wind corridors is irresponsible and can lead to deadly and costly consequences.

As discussed in Section 4.17, *Wildfire*, of the Draft EIR, the Proposed Project excludes any sites located within a VHFHSZ from the Inventory of Candidate Sites for Rezoning. This is further clarified in Chapter 2 of this Final EIR. A majority of the development accommodated under the Proposed Project would be targeted in high resource areas, which are often located in urban areas of the city that are adjacent to high quality transit and away from high fire-prone areas. In addition, the City's extensive regulations and project review scheme would ensure that impacts related to build out of the RHNA in SRA or VHFHSZ areas exacerbating wildfire risks would be avoided, and that for projects in a VHFHSZ or SRA where the LAFD has determined existing regulations are not adequate based on unusual site-specific conditions, roadway conditions, or project characteristics would be required to comply with Mitigation Measures 4.12-1(a) through 4.12-1(d), which include the review of design plans, ensuring adequate emergency access during construction and demolition, preparing a Fire/Vegetation Management Plan for development located in the Fuel Management Zone, and submittal of a plot plan. Furthermore, Policy 1.1.8 of the Proposed Project, as described in Chapter 2, reflects the City's commitment to maintaining low density residential zoning designations in VHFHSZs. With that said, the EIR identifies significant and unavoidable wildfire risk from housing that is already allowed under existing regulations and zoning that could occur in VHFHSZ locations. (Draft EIR at 4.17-19 to 49). The commenter does not identify an inadequacy in the EIR or otherwise support the need for new analysis or impact conclusion in the EIR.

Response O-9.4

The comment states that an increase in wildfires and "ill-placed developments" result in higher frequency and toxicity of smoke exposure to communities, leading to harmful public health impacts due to increased air pollution from burned vegetation and building materials. The comment cites several reports which describe air quality and health impacts of increased fire frequency. The comment adds that the Draft EIR does not include sufficient analysis of the Proposed Project's potential impacts of increased smoke exposure.

Health impacts associated with smoke exposure from wildfire is an existing and ongoing public health concern. However, as discussed in Section 4.17, *Wildfire*, of the Draft EIR, the Proposed Project excludes any sites located within a VHFHSZ from the Inventory of Candidate Sites for Rezoning in an effort to acknowledge the potential impact of high density development in these areas. In addition, a majority of the development accommodated under the Proposed Project would be targeted in high resource areas, which are often located in urban areas of the city that are adjacent to high quality transit and away from high fire-prone areas. Furthermore, Policy 1.1.8 of the Proposed Project, as described in Chapter 2, reflects the City's commitment to maintaining low density residential zoning designations in VHFHSZs and would ensure that mitigation measures are incorporated for new development in hazard areas, including VHFHSZs.

With that said, the EIR acknowledges that some housing development could occur under existing zoning that allow housing in VHFHSZ areas. The Proposed Project is not changing any zoning or land use designations. The EIR further describes that any housing development built under existing regulations would be required to comply with numerous existing regulations to protect against fire, including those related to vegetation management, building materials and emergency access requirements. (Draft EIR at 4.17-36.) In any case, the EIR concluded that impacts related to wildfire risk, including pollutant concentrations from a wildfire would be significant and unavoidable. (Draft EIR at 4.17-40.)

The EIR identifies Mitigation Measures 4.12-1(a) through 4.12-1(d), which include the review of design plans, ensuring adequate emergency access during construction and demolition, preparing a Fire/Vegetation Management Plan for development located in the Fuel Management Zone, and submittal of a plot plan that would be required where the LAFD find existing regulations are inadequate to reduce risk of wildfires. Implementation of these mitigation measures would regulate site design of housing development and minimize any potential of exacerbating existing wildfire risks. However, the EIR discloses that even with the mitigation measures, wildfire risks, including from pollution concentrations could be significant. Additionally, the EIR discloses that imposing the mitigation measures on ministerial projects is infeasible. (Draft EIR at 4.17-40.) Therefore, the EIR discloses that the risk to humans from pollutant concentrations, such as smoke from wildfires, is significant and unavoidable.

While it is true that increased exposure to smoke from wildfires could result in both short-term and long-term health impacts, correlating the potential for increased smoke exposure to a specific level of health risk is not feasible. First, it is not known how much, if any, new housing will actually be built in VHFHSZ areas, so the size and specific locations of any new housing developments in VHFHSZ areas cannot be predicted with any degree of certainty. Similarly, the number of new wildfire events, if any, in VHFHSZ areas cannot be predicted with any degree of certainty. Because of these uncertainties, the location, magnitude, and duration of any future fires in VHFHSZ areas is not known. Therefore, predicting the number, location,

and magnitude of future wildfires over the next eight years would be speculative. In addition, potential health risks vary depending on what is burning. Smoke is made up of a complex mixture of gases and particulate matter (PM) produced when untreated wood and other organic materials burn, which can cause a range of health problems from burning eyes and a runny nose to aggravated chronic heart and lung diseases.[1] When treated wood and other non-organic materials burn, people are potentially exposed to volatile compounds as wells as PM, which can also cause serious health problems depending on the contaminants and length of exposure. Similar to the discussion above, the various circumstances for wildfire events make it infeasible to accurately analyze the health effects of smoke related to any possible increase in wildfires. Finally, the commenter has provided no substantial evidence to support the notion that there is a methodology to accurately forecast the increased smoke exposure and associated health effects related to increased human-caused fires resulting from the Proposed Project.

Response O-9.5

The comment states that wildfires in California are now year-round due to increased human ignitions in fire-prone areas and that the Draft EIR does not adequately consider the physical, mental and emotional health impacts on firefighters and first responders or the significant firefighting costs due to additional development facilitated by the Proposed Project in high fire-prone areas.

See Response 0-9.3 and 0-9.4. Furthermore, additional analysis in the Draft EIR is not warranted given that financial and psychological impacts associated with wildfires are not impacts required for analysis under State CEQA Guidelines. Please see Master Response 3 in Section 3.2.

Response O-9.6

The comment notes that new development in High or VHFHSZs has the potential to cause a significant impact and that existing homes built to current standards are still not fireproof, and therefore the Proposed Project should include restrictions for new development in wildfire severity zones. The comment states that, given known impacts of siting development in fire-prone areas, Policy 3.3.2 of the Proposed Project should include the prohibition of new discretionary residential development in High and VHFHSZs or State Responsibility Areas (SRAs) or, at minimum, the prohibition of such development which would result in significant wildfire impacts as identified in the CEQA Guidelines. The comment adds that Policy 3.3.2 should require applicants for new development of five units or more to provide sufficient documentation to ensure that the proposed development will be insured from wildfires.

[1] United States Environmental Protection Agency (USEPA). 2021. How Smoke from Fires Can Affect Your Health. https://www.epa.gov/pm-pollution/how-smoke-fires-can-affect-your-health. Accessed October 2021.

The commenter's requests to revise Policy 3.3.2 of the Proposed Project is noted, but does not raise issues on the adequacy of the EIR. Please see Master Response 6 in Section 3.2.

As discussed in Section 4.17, *Wildfire*, of the Draft EIR, the Proposed Project specifically excludes any sites located within a VHFHSZ from the Inventory of Candidate Sites for Rezoning. A majority of the development accommodated under the Proposed Project would be targeted in high resource areas, which are often located in urban areas of the city that are adjacent to high quality transit and away from high fire-prone areas. Policy 1.1.8 of the Proposed Project, as described in Chapter 2, reflects the City's commitment to maintaining low density residential zoning designations in VHFHSZs and would ensure that mitigation measures are incorporated for new development in hazard areas, including VHFHSZs.

Response O-9.7

The comment states that home-hardening existing communities should be a central component of Objective 3.3 of the Proposed Project and that Policy 3.3.5 of the Proposed Project should provide a plan for specific retrofits. The comment adds that State funds must be equitably distributed to retrofit existing communities in fire-prone areas and that the City must engage, prepare, and train homeowners to reduce unintentional ignitions and spread of wildfires. The comment cites several reports which describe the benefits of home-hardening features in reducing a community risk of ignition and/or improving chances of structure survival during fires.

The commenter's recommendation that home-hardening existing communities should be a central component of Objective 3.3 of the Proposed Project and that Policy 3.3.5 of the Proposed Project should provide a plan for specific retrofits is noted. Please see Master Response 6 in Section 3.2.

Implementation Program 53 (Disaster Resilience and Recovery) of the Housing Element Update will explore ways to amend codes in VHFHSZs and other hazard areas to better protect life and safety.

Response O-9.8

The comment states that protecting wildlife connectivity in the region is essential to preserving native biodiversity, mitigating against the climate crisis, and prioritizing human health. The comment cites several articles and studies and notes that roads and development create barriers leading to habitat loss and fragmentation, which harms native wildlife by limiting movement and dispersal. The comment states that the EIR must consider corridor redundancy and riparian corridors and buffers, and adds that the EIR must adequately assess and mitigate impacts to wildlife movement and habitat connectivity as the Draft EIR's Biological Resources section fails to offer any real protections for wildlife connectivity. The comment urges

the City to revise the Proposed Project and Draft EIR to include a goal to develop and adopt the Wildlife Ordinance by the end of 2021.

The commenter's request that the City revise the Proposed Project and Draft EIR to include a goal to develop and adopt the Wildlife Ordinance by the end of 2021 is noted. Please see Master Response 6 in Section 3.2. Implementation Program 79 (Housing and Ecology) of the Housing Element Update includes an objective to adopt the Wildlife Pilot Study ordinance by 2022.

The Proposed Project's impacts relating to biological resources were evaluated in Section 4.3 of the Draft EIR. The EIR identified that housing that is accommodated under the Proposed Project could occur in natural areas that could result in impacts to special status species or habitat of special status species, riparian habitats, or wildlife corridors. (Draft EIR at 4.3-8.) While the Proposed Project is not including sensitive habitats in the Rezoning Program, existing residentially zoned sites could be developed over the eight-year plan horizon which could potentially help meet the build out of the RHNA. Based on that, the Draft EIR disclosed that:

> If housing is sited within or adjacent to natural habitat, then it could affect special-status species or their habitats, which would be considered a significant impact. Vegetation clearing and excavation could remove habitat or individuals. Excavation, ground clearing, equipment, and material storage, access routes, and other activities could result in impacts on runoff and/or water quality, potentially affecting aquatic habitat. Excavation, ground clearing, and access routes could also result in air quality impacts (dust, exhaust) that could affect adjacent habitats. Equipment or construction-related traffic could introduce hazardous materials into habitats and generate noise that may impact special status species and/or nesting birds. (Draft EIR at p. 4.3-45)
>
> …
>
> Housing development accommodated under the Housing Element Update that is within or adjacent to sensitive habitats, such as riparian, oak woodlands, or stand of protected trees (e.g., walnuts, oaks, sycamore), could result in potential direct and [sic] impacts through vegetation removal, compaction of soils, and/or indirectly through dust and vegetation thinning. Through zoning restrictions, housing development would be consistent with the objectives, policies, and programs contained within the City's General Plan Conservation Element to protect sensitive species which would have direct and indirect beneficial effects for special status species … , However, it is reasonably foreseeable that implementation of the Project could impact various habitat types, including riparian habitat and other sensitive plan communities. (Draft EIR at 4.3-58.)

…

> Based on the above, housing development accommodated by the Housing Element Update could potentially interfere with the movement of any native resident or migratory fish or wildlife species or within established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Additionally, the Project could result in development on parcels that may contain suitable nesting habitat for birds. Therefore, impacts to native resident, migratory fish and wildlife; established native resident or migratory wildlife corridors; or native wildlife nursery sites would be potentially significant. (Draft EIR at 4.3-65).

Mitigation Measure 4.3-1(a) requires that all discretionary projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes on natural or disturbed areas that contain or have the potential to support special-status species, sensitive habitat, or within 300 feet of suitable habitat to support special-status species as determined by the Department of City Planning and/or California Department of Fish and Wildlife have a biological resources assessment report conducted, which shall identify any potential impacts of the Proposed Project on wildlife corridors. If wildlife corridors are present, the report shall identify measures, such as providing native landscaping to provide cover on the wildlife corridor, that the individual project would be required to implement such that the existing wildlife corridor would remain. Furthermore, wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.

The Draft EIR further disclosed that significant impacts could occur after mitigation because the mitigation measure would not apply to ministerial projects, and even if applied there may still be significant impacts based on site specific conditions. (Draft EIR at 4.3-50; 4.3-63; 4.3-67 to 68.) The comment does not provide a basis for new or different analysis or conclusion in the Draft EIR.

Response O-9.9

The comment states that the City has a legal obligation under State law to protect endangered or threatened animal populations and to reject projects or plans that may jeopardize the survival of such populations. The comment explains that the mountain lions of the Santa Monica Mountains and San Gabriel mountains are provisionally listed under the California Endangered Species Act and are at risk of extinction primarily due to loss of habitat connectivity and open space. The comment adds that since the Proposed Project provides a plan to accommodate new development in mountain lion habitat and connectivity areas, the City must analyze and fully mitigate the impacts of such development.

The Draft EIR disclosed that mountain lions and other animals use areas of natural habitat to move through and around the City, including in the Santa Monica Mountains, Griffith Park, and Sullivan Canyon.

Additionally, these animals may use concrete-lined or earthen stormwater channels in the area for movement. (Draft EIR at 4.3-64.) The Draft EIR also disclosed that "[f]ragmentation of habitat by roads and development within the Santa Monica Mountains is already a serious issue, and retaining existing connectivity (e.g., roadless area) between large undeveloped areas is considered important for the long-term viability of wildlife populations in the Santa Monica Mountains, and therefore is very desirable from the standpoint of conservation planning." (Draft EIR at 4.3-64 to 65.) See Response 0-9.8. The comment does not identify any new mitigation to analyze. To the extent the comment is arguing the City is required to analyze the draft Wildlife Ordinance as a mitigation measure, the City does not find it to be feasible mitigation as the draft ordinance is under evaluation and not yet adopted. Implementation Program 79 (Housing and Ecology) of the Housing Element Update includes an objective to adopt the Wildlife Pilot Study ordinance by 2022. Making the program mandatory is not feasible as the implementation of the pilot study requires significant resources, including staffing to update GIS files, training planners, assigning planners to process entitlements under the new regulations, and enforcing the regulations. The programs in the Proposed Project are subject to the availability of resources to implement. The City has committed resources to the Rezoning Program, which is mandated by State law, but has not yet committed resources to implementation of the Wildlife Pilot Study ordinance; however, it may select to do so should funding become available.

Response O-9.10

The comment states that rezoning should be transit-oriented and that the City should invest in "Complete Streets" as outlined by the LCI, which is a combination of existing City programs which equitably address housing, mobility, and climate simultaneously. The comment provides a summary of the LCI.

The commenter's recommendation that rezoning should be transit-oriented and that the City should invest in "Complete Streets" as outlined by the LCI, is noted. See Master Response 6 in Section 3.2. Nonetheless, the Proposed Project is aligned with the goals of the LCI and its comprehensive vision of mixed-income transit-rich corridors. In addition, City staff have met with LADOT staff and shared the comments with Metro, while exploring additional ways to better reflect efforts to integrate corridor level transit and housing planning. To reflect the connection between housing and the public realm, Program 131 (Livable Communities) has been added to the proposed Housing Element Update, as reflected in Chapter 2 of the Final EIR.

Response O-9.11

The comment strongly opposes Program 55, *Implement CEQA Streamlining Measures*, of the Proposed Project and recommends it be removed from the Proposed Project as CEQA streamlining harms disadvantaged

communities by placing housing on or near polluted lands and perpetuates historical discriminatory planning practices.

The commenter's opposition to Program 55 of the Proposed Project is noted, but does not raise issues on the adequacy of the EIR. The comment will be included in the administrative record for consideration by the City Council in approving the project. Please see Master Response 6 in Section 3.2.

Response O-9.12

The comment urges the Proposed Project to include policies that restrict new development in wildfire hazard severity zones and to adopt the Wildlife Ordinance by the end of 2021, and states that prohibiting new development in wildfire zones would prioritize human health and safety as well as the protection of the City's biodiversity. The comment adds that the EIR must include an assessment of the significant impact of wildfire to human health and wildlife with science-based mitigation efforts to minimize these impacts.

See Response 0-9.4, O-9.6 and O-9.8.

LETTER O-10

COMMENTER: Kimberly Christensen, AICP, Land Use Committee Co-Chair
Westside Neighborhood Council
P.O. Box 64370
Los Angeles, CA 90064

DATE: September 7, 2021

Response O-10.1

The comment states that the Housing Element Update and Draft EIR processes have not been transparent and have been out of compliance with State laws. The comment adds that they have repeatedly asked for information from the City regarding population projections, housing demand, and the list of candidate sites through the Housing Element Update process. The comment states that releasing a draft Housing Element Update without significant pieces of information (i.e., Appendix 4.1 and Appendix 4.7) relevant to the CEQA process warrants recirculation of the Draft EIR to incorporate additional analysis. The comment requests that the comment period for the Draft EIR be extended in addition to recirculation of the Draft EIR.

Although the comment states that Appendix 4.1 (Inventory of Adequate Sites for Housing) was not released until September 4, 2021, this statement is not accurate and the Appendix was included with the July 1, 2021 release of the draft Housing Element Update on the Department of City Planning website, which was released for public review prior to the circulation of the Draft EIR.

While the Draft EIR included a description and analysis of the Rezoning Program, Appendix 4.7 (Inventory of Candidate Sites for Rezoning) to the draft Housing Element Update was not initially included in the July 1, 2021, online posting of the Housing Element Update for public review and comment because it took time to collect the relevant information to compile the list of sites. However, Appendix 4.7 was added to the City's webpage for the Housing Element Update under the "Draft Plan" tab on September 15, 2021: https://planning.lacity.org/plans-policies/housing-element-update#draft-plan. City staff sought to get initial public and City Council feedback on the broad rezoning strategies before beginning the data-heavy work program to develop the list of candidate sites. City Council adopted recommendations regarding the Rezoning Program on August 17, 2021, and developing the list of sites thereafter was a time consuming effort based on the size of the city and number of sites (i.e., approximately 250,000). As described in Chapter 2, while the revised draft provides additional information on the individual strategies encompassed under the Rezoning Program, and includes a list of potential candidate sites, this information is consistent with

the description the Rezoning Program provided in the Draft EIR, in particular with regard to geography and types of strategies included. In order to facilitate better public understanding of the large list of candidate sites for rezoning, City Planning published a web application map tool that allows the public to view the distribution of sites at a citywide or local level, by strategy or overall, and to zoom into parcels to view specific information for each site. The web application map tool was published on October 1, 2021 and can be accessed on the City Planning website at: https://storymaps.arcgis.com/stories/59a896a0931346a7a94acbf9917f90b7

Moreover, the commenter does not provide an explanation or supporting evidence as to how the subsequent availability of Appendix 4.7 resulted in a deficient Draft EIR. Please see Master Response 2, 4, and 5 in Section 3.2. As discussed in Section 3, *Project Description*, of the Draft EIR, the EIR analyzes the construction and operation of 420,327 housing units, which is intended to provide a conservative analysis of the "worst-case" scenario of environmental impacts from implementation of the Housing Element Update through 2029. As drafted, the EIR adequately analyzes the potential impacts on the environment resulting from housing development accommodated by the Proposed Project, identifies the significant impacts, and describes feasible mitigation measures that could minimize significant adverse impacts.

Response O-10.2

The comment states that it came to their attention on September 4, 2021, that, Appendix 4.1 (Inventory of Adequate Sites for Housing) had been posted to the City's webpage for the Housing Element Update, which was also modified, and that the comment period was extended to September 22, 2021, due to those modifications to the Housing Element Update. The comment states that a summary of the changes was not provided to the public well in advance of the public hearings held on the matter and questions how the public is meant to evaluate new information without sufficient time. The comment adds that it violates the requirement to provide adequate opportunity for the public to participate in the review process for the Project.

The comment is noted but does not raise issues on the adequacy of the EIR. Please see Master 4 in Section 3.2.

Response O-10.3

The comment refers to page 4-2 of Section 4, *Environmental Analysis*, of the Draft EIR, which states that "a 1-10 unit single-family residential project in hillside areas are more likely to require substantial earthwork/ground disturbance…". The comment states that one unit is a single-family residence and anything greater is a multi-family residence. The comment requests that the discussion in the Draft EIR be revised to clarify the language.

The comment refers to a typographical error which has been corrected to state "a 1-10 unit single-family or multi-family residential project in hillside areas ~~are~~ is more likely to require substantial earthwork/ground disturbance… ". This correction is also included in Chapter 4, *Revisions, Clarification and Corrections to the Draft EIR*, as a change from the Draft EIR.

Response O-10.4

The comment asks for the criteria used in selecting the 54 sample projects used throughout the Draft EIR analysis. The comment also asks how the City determined that these projects would be a representative sample since they seem to be primarily located in Downtown Los Angeles.

The criteria used to select the 54 sample projects was type of project (i.e., multi-family residential, single-family residential, ADUs, mixed use development, and conversion and/or rehabilitation), scale of project (single family to large tower/mixed use), location with the broadest range of geographies and environmental conditions , and levels of development and density (hillsides, urban, regional centers, coastal, and suburban areas). The purposes was to pull projects that provided a representative sample of the different types and scales of housing development that are likely to occur in locations throughout the City to best identify the broadest range of environmental impacts even under worst case scenarios that occur with housing projects in the City. The intent was to be conservative and identify all of the potential ways housing can result in environmental impacts in the City. As discussed in the Draft EIR, hundreds of categorical exemptions are used for small to medium scale housing projects, including Class 32 for infill projects up to 75 units or more, every year. As shown through the City's review of environmental clearances to prepare this EIR, the large majority of housing projects will not have any significant impacts to the environment. (Draft EIR at 4-4.) It is less than 10 percent of discretionary housing projects that require an EIR due to significant unavoidable impacts. This is why the case studies are more heavily weighted towards larger scale projects or those in hillside areas that are more likely to have significant impacts. Smaller projects in more urban infill areas are less likely to require an EIR or even a mitigated negative declaration or sustainable communities environmental assessment.

Response O-10.5

The comment states that Section 4.1, *Aesthetics*, of the Draft EIR does not analyze impacts based upon the goals, policies, and objectives of all Community Plans and requirements of the Neighborhood Oriented Districts and requests that the Draft EIR be revised to do so.

As drafted, the EIR adequately analyzes the potential impacts on the environment resulting from housing development accommodated by the Proposed Project, identifies the significant impacts, and describes feasible mitigation measures that could minimize significant adverse impacts. The commenter does not

provide substantial evidence to support that aesthetic impacts were only analyzed based upon the Downtown Plan, or that analyzing based on each Community Plans is necessary. The Draft EIR provided numerous examples of aesthetic character throughout the City. (Draft EIR at 4.1-5 to 4.1-19.) The Draft EIR also identified that Community Plans, Specific Plans and overlays throughout the City, provide policies to protect aesthetics in communities, and included examples, including the Brentwood—Pacific Palisades Community Plan policies, such as, preserving existing views in hillsides and preserving architecturally and historically significant features. (Draft EIR at 4.1-24.) The Draft EIR disclosed that housing development would occur in more urbanized areas and less dense areas, which may include but are not limited to, hillside areas or areas adjacent to open and natural space. (Draft EIR at 4.1-37 to 40.) The Draft EIR disclosed that most of the City is single family residential and, in these areas, the most common housing under the Proposed Plan would be single family, low density multi-family and ADUs and rehabilitation and conversions. (Draft EIR at 4.1-40.) Such development would be required to comply with existing regulations which would avoid or minimize potential impacts to visual character in low density areas. (Draft EIR at 4.1-40.) The EIR discussed a case study in an undeveloped area with the Hidden Creek Estate project. (Draft EIR at 4.1-45.) The EIR concluded that the Proposed Plan would result in less than significant impacts to aesthetic quality, including because projects would be required to comply with regulations adopted to protect visual quality. (Draft EIR at 4.1-49.) Additionally, zoning ordinances adopted under the Rezoning Program would be required to be consistent with the General Plan, including the Community Plans as part of the Land Use Element, pursuant to Charter Section 556 and 558.

Response O-10.6

The comment states that the significance threshold of 462 single-family units, 612 multi-family units, or some combination before mitigation is required per Air Quality mitigation measure 4.2-2(b) to implement TDM measures is incredibly high. The comment adds that the City should require TDM measures (e.g., bike sharing, electrical vehicle charging station infrastructure) at a lower threshold to reduce air quality and greenhouse gas impacts.

As discussed in Section 4.2, *Air Quality*, modeling was performed to determine the largest individual project sizes that would typically be anticipated to result in emissions that do not exceed South Coast Air Quality Management District (SCAQMD) thresholds. Through iterative modeling it was determined that operation of a 462 single-family unit project or a 612 multi-family unit project (multi-family or mixed use) would typically result in emissions that approach but remain less than SCAQMD thresholds. Furthermore, a review of the 54 housing development projects in the city (as shown in Table 4-2 in Section 4, *Environmental Analysis*, of the Draft EIR) shows that air quality impacts were less than significant for the majority of the developments reviewed. Only 3 of the 54 projects had significant unavoidable impacts for operations; the ICON Panorama (mixed use project; operational impacts due to mobile source emissions),

the Crossroads Hollywood (950 multi-family dwellings), and the 1001 Olympic (879-1,367 multi-family dwellings). Therefore, Mitigation Measure 4.2-2(b) would require air quality analysis and appropriate mitigation for projects that exceed screening criteria for operational emissions. With implementation of Mitigation Measure 4.2-2(b), air emissions associated with housing development accommodated under Housing Element Update would be generally reduced to less than SCAQMD significance thresholds. However, it is possible that large projects, or projects with unusual circumstances, would result in emissions that exceed SCAQMD significance thresholds with implementation of appropriate project-specific mitigation. The Draft EIR acknowledges that, in the absence of detailed information regarding the specific development proposed, it is not possible to preclude the possibility that operation would result in cumulatively considerable net increase of any criteria pollutants the, and therefore determines potential impacts would be significant and unavoidable even with implementation of mitigation. Furthermore, the comment does not provide justification and supporting evidence for a different threshold of significance for Mitigation Measure 4.2-2(b). See Master Response 5 in Section 3.2.

Response O-10.7

With respect to cultural resources, the comment states that the City has limited protection of historic resources even in Historic Preservation Overlay Zones (HPOZ) and adds that "by right" housing development should not destroy, remove, or compromise historic resources. The comment requests that additional mitigation measures be added to the Draft EIR to protect historic resources.

The comment does not provide justification or supporting evidence for the inclusion of additional mitigation measures for historic resources. See Master Response 5 in Section 3.2.

As discussed in Section 4.4, *Cultural Resources*, for the purpose of analyzing impacts to historical resources, historical resources include (a) all resources on the California Register (which include those on the National Register); (b) all Historic Cultural Monuments (HCMs), (c) all Historic Preservation Overlay Zones (HPOZs); and (d) all resources identified as potentially eligible for listing, individually or as a contributor, in a survey prepared for or accepted by the City. The Housing Element Update does not specifically call for the demolition, destruction, removal, or alteration of any historical resource. Nonetheless, although the City's cultural resource regulations and policies assist in protecting historical resources, it is possible that demolition of and/or significant alteration to some historical resources, or construction of incompatible development could occur as a result of the build out of the RHNA.

Implementation of Mitigation Measures 4.4-1(a) through 4.4-1(j) already included in the Draft EIR would reduce potentially significant impacts to historical resources to the maximum extent feasible. This would be accomplished by requiring a process for the identification of known and potential historical resources

(i.e., Mitigation Measures 4.4-1(a)), and measures to ensure compliance with the Secretary of the Interior's Standards for rehabilitation, new construction, or relocation (i.e., Mitigation Measures 4.4-1(b), 4.4-1(c), and 4.4-1(d)). If compliance with the Standards is not feasible, documentation of the resource pursuant to Historic American Buildings Survey (HABS) standards (i.e., Mitigation Measure 4.4-1(e)), the installation of interpretive displays (i.e., Mitigation Measure 4.4-1(f)), and/or construction monitoring and salvage of historical building materials (i.e., Mitigation Measure 4.4-1(g)) would be required. In addition, mitigation measures for the protection of historical resources located in close proximity to construction sites include the temporary relocation of historical resources, excavation and shoring planning, and structural construction monitoring (i.e., Mitigation Measures 4.4-1(h), 4.4-1(i), and 4.4-1(j)). However, the Draft EIR acknowledges that compliance with Secretary's Standards, however, cannot be assured in all cases and demolition or removal of a historically significant resource typically cannot be mitigated to below a level of significance under CEQA. Additionally, applying the mitigation measures to ministerial projects is not feasible. Therefore, the Draft EIR determines potential impacts would be significant and unavoidable even with implementation of mitigation.

Response O-10.8

The comment states that page 4.1-12 of the Draft EIR does not address Neighborhood Oriented Districts (NOD) and their provisions for ground floor level retail.

Although the commenter references page 4.1-12, it is likely this in an error and mean to reference page 4.9-12 in Section 4.9, *Land Use and Planning*, of the Draft EIR, which describes an NOD. The commenter's request to address NOD is noted but does not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 4.2.

Response O-10.9

With respect to land use and planning, the comment states that the Draft EIR does not address heightened impacts if housing is concentrated only in certain parts of the City (High and Very High Resource Areas) and are not distributed throughout the city.

As discussed in Section 3, *Project Description*, of the Draft EIR, a Project objective is to "promote concentrated housing growth in Higher Resource areas and in areas with good access to jobs, services, and high-quality public transit" throughout the city. The EIR analysis views these Higher Resource areas as prospective locations of new housing development based on reasonable assumptions, in addition to other areas where housing development is permitted. As described in Chapter 3, *Project Description*, the assumptions are made and supported by analysis of the types and locations of housing development that have historically been permitted in the City (looking at building permits issued from 2009-2019). (Draft EIR

at 3-33.) As noted, housing can be built on existing opportunity sites, that are zoned for residential uses, sites that are in the Rezoning Program, or in other locations altogether. The Proposed Project does not mandate where housing will be built, although it includes policies in Rezoning Program to encourage housing in High and Highest Resource Areas, where housing gets built in the next 8 years is dependent on many factors, including market forces. The commenter has not provided substantial evidence to support that the City's assumptions are unreasonable or unsupported. No further response is required and no changes to the analysis or conclusions in the EIR are necessary.

Response O-10.10

The comment references the discussion on page 4.9-20 of the Draft EIR and asks how Objective 4.3 of the Housing Element Update will be met to conserve the scale and character of residential neighborhoods and promote compatibility to surrounding High and Very High Resource Areas.

The comment is noted but does not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2.

Response O-10.11

The comment questions how adequate mitigation measures related to Land Use can be developed for impacted areas without analyzing the candidate site maps.

The commenter does not provide an explanation or supporting evidence as to how the subsequent availability of Appendix 4.7 (Inventory of Candidate Sites for Rezoning) resulted in a deficient Draft EIR. Additionally, as noted in Response O-10.1, the commenter's assertion that Appendix 4.1 was not available at the time the Draft EIR was circulated is inaccurate. As discussed in Section 3, *Project Description*, of the Draft EIR, the EIR analyzes the construction and operation of 420,327 housing units, which is intended to provide a conservative analysis of the "worst-case" scenario of environmental impacts from implementation of the Housing Element Update through 2029. As drafted, the EIR adequately analyzes the potential impacts on the environment resulting from housing development accommodated by the Proposed Project, identifies the significant impacts, and describes feasible mitigation measures that could minimize significant adverse impacts. Revisions or recirculation of the Draft EIR are not required or necessary. Please see Master Response 2, 4, and 5 in Section 3.2.

Response O-10.12

The comment states that the significant and unavoidable impact determination for recreation should not be made worse by not including meaningful mitigation (separate from Quimby fees) in the Draft EIR that

can be incorporated as a requirement for housing development. The comment adds that development fees under Los Angeles Municipal Code (LAMC) Section 21.10.3 are not adequate and states that 1) housing development should not eliminate existing parks, and 2) recreation amenities should be encouraged for smaller housing development and required for larger housing developments.

The City has conducted studies like the *Citywide Community Needs Assessment* and the *Parks Condition Assessment Report* to address issues with recreational facilities and manage the status of current and future recreational facilities. However, due to the lack of available space to develop new parks to serve the anticipated population growth in dense urban areas of the City, feasible mitigation beyond the policies and initiatives included in current City policies/programs and the Housing Element Update to enhance recreational opportunities is not available. Therefore, the EIR concludes the impact would be significant and unavoidable.

The commenter has not supported with substantial evidence that new housing would eliminate existing parks and that mitigation measure to prohibit eliminating parks is necessary. The Proposed Project does not include any policies or programs that would support putting housing on existing parks and it is not foreseeable. Any future housing development would have to be consistent with General Plan policies that support increasing not reducing or eliminating park space. (Draft EIR at 4.13-11 to 12.)

The commenter's suggested unspecified mitigation to require additional fees, improvements, or dedications for parks and/or onsite open space or recreational amenities, beyond what the City requires is not desirable from a policy perspective as it will add additional cost to providing needed housing. The existing Quimby/Park Facility Fee was updated in 2016 and included policy decisions at that time to which looked at economic feasibility of the fee in light of disincentivizing desirable development., such as housing. These fees are adjusted on July 1st of each year by a percentage equal to a weighted average of the annual percentage change in the Construction Cost Index for Los Angeles, and the annual percentage change in the Median Home Sales Price for the City. Additionally, on site open space and recreational amenities in existing zoning are also adopted in consideration of economic feasibility on desirable development. The City does not desire to use limited resources needed for other policy efforts, to reconsider the economic feasibility of requiring additional recreation requirements on housing development or delay the Proposed Project to undertake such an effort. Based on this the suggested mitigation measure is not feasible.

Response O-10.13

With respect to transportation impacts, the comment states that Threshold 4.14-4 of the Draft EIR only addresses impacts to emergency access during construction and does not provide an analysis, or

mitigation, for more permanent impacts to emergency access during operation. The comment states that a concentration of housing development in High or Very High Resource Areas may generate significant impacts to emergency access during operation since many areas have streets with limited accessibility due to transit line crossings and restricted intersection turning movements, such as the at-grade crossings of the Exposition line with streets at Barrington, Military, Westwood, and Overland Avenues. The comment requests that an analysis for operational impacts to emergency access be added to the Draft EIR.

The Draft EIR addresses impacts to emergency access from operation of the Project under Threshold 4.14-4 in addition to the impact analysis for emergency access during construction. The Draft EIR states that, as many of the City's roadways are congested, it is foreseeable that build out of the RHNA would result in additional congestion. Nonetheless, in consideration of environmental review associated with the Downtown Community Plan Update and Hollywood Community Plan Update (two geographic areas with some of the most congested roadways), the impacts to emergency response times would not be anticipated to result in significant impacts to emergency access. The relevant analysis from the Downtown Community Plan Update is detailed between pages 4.14-81 and 4.14-86 and is found to be relevant and applicable to the issue for potential impacts to emergency response times from congestion resulting from build out of the RHNA. Therefore, based on previous analyses, the Draft EIR determined that impacts from the Housing Element Update to emergency response times from congestion would be less than significant. The Downtown EIR concluded that congested roadways would increase from 15 to 44 percent with the Downtown Community Plan Update, with many streets operating at LOS F. Even with that being the case, the Draft EIR found that emergency access would be less than significant. Similarly, the recently adopted Exposition Corridor Specific Plan found that impacts to emergency access from increased congestion would have less than significant impacts, notwithstanding that significant and unavoidable LOS impacts would increase to 50 intersections by plan horizon. (EXPO EIR, SCH No. 2013031038,[2] Draft EIR at 4.12-69, 78 to 79.) As discussed in all of those EIRs, congestion is not directly correlated to a decrease in emergency response times. LAFD and LAPD are required by Constitutional mandate to provide public safety services to the residents of the City. To the extent that congestion impacts the provision of those services, the Departments monitor those impacts and adjust and plan to respond, whether it is building new facilities or reallocation staff and equipment. (Draft EIR at 4.14-84 to 4.14-86.) The commenter has not provided substantial evidence to support that new or additional analysis is required in the Draft EIR.

Response O-10.14

The comment states concerns regarding water demand that could exceed supply considering the high and repeated levels of drought and historically low water levels at Lake Mead and the Colorado River. The

[2] https://planning.lacity.org/eir/ExpositionCorridor/Deir/files/4.12%20Transportation%20Traffic.pdf

comment adds that the UWMP does not account for these unprecedented reductions to water supply and requests that a more conservative analysis be added to the Draft EIR.

Given that the comment raises concern with the UWMP, which is a planning document created and implemented by LADWP, Staff contacted LADWP for assistance in providing a response. The following response was provided by Benjamin Wong, project manager for the 2020 UWMP, via email correspondence on October 15, 2021, to the Planning Department:

> LADWP's 2020 UWMP recognizes hydrologic variability through dry and wet year cycles as a risk to water supply reliability and outlines strategies to mitigate such risks. The UWMP reliability assessment evaluates a single dry year, multiple dry years spanning five years, and drought risk assessment scenarios in addition to evaluation of reliability under average year conditions. These assessments also incorporate projected impacts of climate change that were determined through comprehensive climate studies. LADWP continues to monitor the evolving climate research and is actively evaluating potential impacts to LA Aqueduct water supplies. Impacts to other imported sources are also actively studied by the California Department of Water Resources (DWR) and the US Bureau Reclamation (USBR) as reported in the Metropolitan Water District (MWD) UWMP. Please note that for MWD's UWMP:
>
> - Forecasts are based on DWR's Delivery Capability Report and USBR's Colorado River modeling for future water supply availability from the SWP and CRA. Both the DWR and USBR models incorporate long historic records with wide ranging hydrologic conditions, and are recognized as appropriate source of information for complying with the reporting requirements of the California Water Code.
>
> - MWD completed its water reliability assessment, under the stated UWMP assumptions and conditions required by the UWMP Act, and determined that it has supply capabilities sufficient to meet expected demands from 2025 through 2045 under single dry-year, normal year, and droughts lasting five consecutive year conditions.
>
> UWMPs are updated every 5 years and future updates will incorporate recent hydrologic information for future forecasts.
>
> LADWP has also developed a Water Shortage Contingency Plan (WSCP) that outlines response actions LADWP may take in the event of a water shortage. While the UWMP reliability scenarios primarily focus on long term reliability or near-term drought based on historic hydrology, the WSCP outlines tools available to respond to short term shortages such as from intensifying drought or earthquakes.

LADWP rigorously tests all water in its distribution system to ensure that water quality meets or exceeds state and federal drinking water standards.

Response O-10.15

The comment refers to page 5-2 of the Draft EIR related to Other CEQA Considerations and states that the assumption that new technologies or systems would further reduce the City's reliance on nonrenewable energy is a false assumption as future advances in technology are not known at this time. The comment requests that the Draft EIR be revised.

As discussed in Section 5, *Other CEQA Considerations*, of the Draft EIR, housing development accommodated under the Housing Element Update would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations), and the Los Angeles Green Building Code (LAMC Chapter IX, Article 9). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. New developments would also be required to comply with the Los Angeles Green Building Code, which contains mandatory measures for residential and non-residential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems). While consumption of natural resources in the City would increase with implementation of the Housing Element Update due to development and associated population increases, it is also likely that in response to GHG reduction mandates, new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the City's reliance upon nonrenewable natural resources. Therefore, in light of existing energy conservation requirements for housing development, the Draft EIR does not rely on a "false assumption" that new technologies will emerge but rather mentions it as a likely future circumstance that would advance strategies for energy efficiency and applicability. See Master Response 5 in Section 3.2.

Response O-10.16

The comment states that they have additional comments that they were not able to complete prior to the September 7th deadline and adds that they will submit an additional letter.

The comment is noted.

LETTER I-1

COMMENTER: Tom Williams

DATE: July 22, 2021

Response I-1.1

The comment states that the environmental document linked on the Housing Element Update webpage is not the Draft EIR for the project and requests that the Draft EIR be provided separate from the Housing Element Update and the Safety Element Update.

The Draft EIR is found on the City's webpage for the Housing Element Update under the "Resources" tab separate from the Housing Element Update document (https://planning.lacity.org/plans-policies/housing-element-update#resources), as well as on the City's webpage for published CEQA documents (https://planning.lacity.org/development-services/eir/Housing-Element_2021-2029_Update_Safety-Element_Update_deir). While the commenter received a notice and link to the online Housing Element Update, Safety Element Update, and Draft EIR as part of a distribution list on July 22, 2021, a follow-up link was directly provided to the commenter by City staff via email on July 23, 2021.

Response I-2.1

The comment states that the Safety Element Update analysis in the Draft EIR is inadequate and incomplete.

The potential impacts associated with the Safety Element Update are addressed in the Initial Study and Draft EIR. The commenter does not provide any evidence to support their claim regarding the adequacy of the analysis in the Draft EIR or otherwise raise any significant environmental issues. Please see Master Response 4 and 5 in Section 3.2.

LETTER I-2

COMMENTER: Casey Maddren

DATE: September 7, 2021

Response I-2.1

The comment questions the adequacy of the analysis in Section 4.16, *Utilities and Service Systems*, of the Draft EIR related to the Project's impacts upon wastewater treatment and stormwater drainage facilities that would serve the Project, particularly the Hyperion Water Treatment Plant in Playa Del Rey. The comment highlights the recent July 2021 crisis at Hyperion in which the treatment facility was overwhelmed with a massive flow of debris that flooded its floors, destroyed electrical systems and equipment, forced the discharge of raw sewage into the ocean, and left the treatment facility in a compromised state with respect to its treatment and recycling capabilities. The comment acknowledges that the Draft EIR was prepared prior to this event, but questions if the "less than significant" impact with regard to wastewater facilities remains accurate and requests that the EIR be revised to provide a more accurate representation of Hyperion's current and long-term treatment capabilities.

Based on a call with the Los Angeles Sanitation Department (LASAN) on September 30, 2021, LASAN has conducted population projections for the Hyperion Water Treatment Plan (Hyperion) and have determined that the facility is operating at substantially below the capacity and is expected to until the year 2040. The average wastewater flow of the facility is approximately 300 million gallons per day (MGD) whereas the maximum capacity is 600 MGD, or approximately double the average wastewater flow. Therefore, considering Hyperion's current capacity and the City's ongoing conservation efforts, the facility can handle the anticipated wastewater flow associated with the projected population growth. Regarding the July sewage spill and flooding event, the overflows that occurred as a result of large amounts of sudden debris were not an issue of capacity. Rather, the cause has not yet been determined and an investigation is ongoing to identify the cause. The facility is currently operating at pre-July levels, and the results of the water and air quality measurements conducted as part of regular monitoring are back to pre-July levels. Third-party experts are exploring a response and action plan to better prepare against similar disasters should they happen in the future. Therefore, the potential impacts associated with wastewater under the Housing Element Update remain less than significant.

Response I-2.2

The comment compares the projected growth of 168,479 housing units by 2030 based on the UWMP to the 420,327 housing units accommodated by the Housing Element Update by the horizon year 2029 based on

the RHNA Allocation, questions the discrepancy despite both relying on SCAG projections, and expresses concern over the City's ability to meet the Project's future water demand. The comment states that the UWMP's water supply projections and ability to meet future demand is based on optimistic assumptions regarding future water deliveries from the LA Aqueduct, conservation efforts, and stormwater capture in light of the State experiencing a multi-year dry period, reduced water deliveries from groundwater resources and the MWD, and Hyperion's hindered capabilities of providing recycled water. The comment questions the adequacy of the water supply analysis included in Section 4.16, *Utilities and Service Systems*, given that 1) the UWMP was prepared prior to recent events that potentially impacted the City's water supply, and 2) the EIR analysis relies on the UWMP for the determination that the City would meet future water demand under the Housing Element Update.

Given that the comment raises concern with the UWMP, which is a planning document created and implemented by LADWP, Staff contacted LADWP for assistance in providing a response. The following response was provided by Benjamin Wong, project manager for the 2020 UWMP, via email correspondence on October 15, 2021.

> While the total housing unit projections from the RHNA and SCAG differ, the population forecasted to occupy those units remains the same. The demand forecast from the UWMP is primarily driven by population rather than housing units, which allows the demand forecast to remain valid despite the difference in housing unit forecast. As discussed in Section 11, *Population and Housing*, of the Draft EIR, the Proposed Plan is accommodating forecasted growth and existing need and is not growth inducing and is not anticipated to result in population in excess of SCAG's forecasts in the RTP/SCS. (Draft EIR at p 4.11-10.)
>
> LADWP's 2020 UWMP forecasted supplies recognize the limited access to clean groundwater resources due to contamination but also describes efforts to restore this access through remediation projects. Forecasts of projected deliveries from MWD and the LA Aqueduct are dependent on hydrologic conditions and consider potential future impacts on supply due to climate change.
>
> LADWP's 2020 UWMP recognizes hydrologic variability through dry and wet year cycles as a risk to water supply reliability and outlines strategies to mitigate such risks. The UWMP reliability assessment evaluates a single dry year, multiple dry years spanning five years, and drought risk assessment scenarios in addition to evaluation of reliability under average year conditions. These assessments also incorporate projected impacts of climate change that were determined through comprehensive climate studies. LADWP continues to monitor the evolving climate research and is actively evaluating potential impacts to LA Aqueduct water supplies. Impacts to other imported sources are also actively studied by the California Department of Water Resources (DWR) and the

US Bureau Reclamation (USBR) as reported in MWD's UWMP. Please note that for MWD's UWMP:

- Forecasts are based on DWR's Delivery Capability Report and USBR's Colorado River modeling for future water supply availability from the SWP and CRA. Both the DWR and USBR models incorporate long historic records with wide ranging hydrologic conditions, and are recognized as appropriate source of information for complying with the reporting requirements of the California Water Code.

- MWD completed its water reliability assessment, under the stated UWMP assumptions and conditions required by the UWMP Act, and determined that it has supply capabilities sufficient to meet expected demands from 2025 through 2045 under single dry-year, normal year, and droughts lasting five consecutive year conditions.

UWMPs are updated every 5 years and future updates will incorporate recent hydrologic information for future forecasts.

LADWP has also developed a Water Shortage Contingency Plan (WSCP) that outlines response actions LADWP may take in the event of a water shortage. While the UWMP reliability scenarios primarily focus on long term reliability or near-term drought based on historic hydrology, the WSCP outlines tools available to respond to short term shortages such as from intensifying drought or earthquakes.

Response I-2.4

The comment questions the adequacy of the solid waste analysis included in Section 19, *Utilities and Service Systems*, of the Initial Study to the Draft EIR (Appendix A of the Draft EIR). The comment asserts that the City is nowhere near a landfill diversion rate of 76.4 percent claimed in the City's Zero Waste Progress Report cited in the Initial Study and adds that, when asked, the City was unable to provide the percentage of solid waste diverted for the years 2019 and 2020. The commenter states that, due to the increase of recycling materials in the State (caused by China ceasing most imports of recyclables) driving down prices for recyclables and resulting in the closure of recycling companies, the City amended its contracts in 2019 with participating waste haulers to reduce landfill diversion targets to 65 percent through 2023 and 45 percent through 2025. The comment states the City is currently not diverting 50 percent of its solid waste, contrary to the Draft EIR analysis, and that the Draft EIR's claim that the City will achieve a landfill diversion rate of 90 percent by 2025 is not credible. The comment concludes that the determination that the Project would result in a less than significant impact to solid waste is not supported by evidence.

Although the waste diversion data provided in the Initial Study is based on the Solid Waste Integrated Resources Plan from 2013, the generation of solid waste and the landfill capacity status are from current 2019 and 2020 data. In addition, as stated in the Initial Study, any project development is currently required to implement a Solid Waste Diversion Program and divert at least 75 percent of its generated solid waste from the serving landfill site. Housing development accommodated by the Project would be required to comply with goals, policies, and programs for waste diversion on an ongoing basis as City infrastructure continues to improve to meet its percent diversion goals.

The City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, lays out a long-term plan through 2030 for the City's solid waste programs, policies and environmental infrastructure[3]. The SWIRP proposes an approach for the City to achieve a goal of 90 percent diversion by 2025 and 97 percent diversion by 2030. These targeted diversion rates would be implemented through an enhancement of existing policies and programs, implementation of new policies and programs, and the development of future facilities to meet the City's recycling and solid waste infrastructure needs over a 20-year planning period. Therefore, based on current data and City plans, reasonably foreseeable development under the Housing Element Update would not generate solid waste in excess of State or local standards or the capacity of local infrastructure. The Proposed Project would not otherwise impair the attainment of solid waste reduction goals and potential impacts would be less than significant under CEQA.

[3] LASAN. City of Los Angeles Solid Waste Integrated Resources Plan – A Zero Waste Master Plan. October 2013. https://www.lacitysan.org/san/sandocview?docname=cnt012522

LETTER I-3

COMMENTER: George Papanikolas

DATE: July 22, 2021

Response I-3.1

The comment asks that the City remove height restrictions and build taller housing developments to allow for more open space and parks.

The commenter's request is noted, but does not raise issues on the adequacy of the EIR. Please see Master Response 6 in Section 3.2.

LETTER I-4

COMMENTER: Janis Hatlestad

DATE: July 22, 2021

Response I-4.1

The comment expresses concern over how the City plans to preserve and protect communities and homeowners from development organizations buying up large numbers of properties sold at auction and asks how the City would implement Policy 2.2.5, "Protect communities, especially communities of color, from predatory lending, land acquisition, speculative real estate transactions," of the Housing Element Update to ensure its objective is met.

The commenter's concern is noted, but does not pertain to the EIR. Overall, policies associated with objectives under Goal 2 (Housing Preservation and Housing Stability) emphasize the importance of protecting the most vulnerable residents from housing instability and the preservation of affordable housing. No further response is required because the commenter does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see Master Responses 4 and 7 in Section 3.2.

LETTER I-5

COMMENTER: Eric Preven

DATE: July 22, 2021

Response I-5.1

The comment states that residents should not be allowed to purchase parking permits the Los Angeles Department of Transportation (LADOT) that serves as an "exclusive license" to use the public right-of-way and adds that the Housing Element Update would further push the City into a "ticketing trap" by allowing owners to purchase passes at below market prices. The comment requests that the DCP and LADOT hold a meeting on the subject prior to the Final EIR.

Without additional information, it is assumed the commenter refers to the City's existing program in which residents can purchase a parking permit that allows them to park their vehicles in a regulated Preferential Parking District (PPD) and the proposed implementation program in the Housing Element Update of implementing discount parking passes or other incentives for shared vehicles. The commenter's request for a meeting between DCP and LADOT is noted, but does not but does not raise issues on the adequacy of the EIR. No further response is required because the commenter does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see Master Response 4 in Section 3.2.

LETTER I-6

COMMENTER: Katrina Jenkins

DATE: July 22, 2021

Response I-6.1

The comment suggests that the City maximize the areas being developed by building vertically (e.g., subterranean parking structures, commercial/business uses at street level, residential units at higher levels, and open space at rooftops). The comment also suggests that housing for the homeless population include supporting uses, such as live-in social workers (drawn in by an offer of free housing) and recreation opportunities.

The commenter's suggestions to maximize development potential by building vertically and to include supporting uses in housing for the homeless population are noted, but do not raise issues on the adequacy of the EIR. Please see Master Responses 4 and 7 in Section 3.2. Nonetheless, with respect to maximizing development intensity, housing accommodated under the Housing Element Update is expected to comply with applicable zoning and other regulations. In addition, under the Rezoning Program, the City would prioritize rezoning in existing urbanized areas and any rezoning would be required to be consistent with applicable policies and goals from the General Plan, including the Framework Element and community plans. . No further response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER I-7

COMMENTER: PB

DATE: July 23, 2021

Response I-7.1

The comment questions the status of City plans to protect select neighborhoods from flooding (i.e., mandatory flood insurance) and prior involvement from the Federal Emergency Management Agency (FEMA) in these plans. The comment also questions the status of plans for the Bowtie Project.

The commenter's questions regarding flood control and the Bowtie Project are noted, but do not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2. Nonetheless, flood control is addressed in Section 4.8, *Hydrology and Water Quality*, of the Draft EIR which includes Mitigation Measure 4.8-1 (Drainage Pattern Alterations and Flood Control). In addition, as discussed in Section 10, *Hydrology and Water Quality*, of the Initial Study (Appendix A of the Draft EIR), all project development would be required to comply with the regulations described in the City's regulatory compliance measure (RCM) WQ-5 (Alteration of a State or Federal Watercourse) to minimize the potential for impacts to jurisdictional watercourses. As specified in RCM-WQ-6 (Flooding/Tidal Waves), all project development that would occur in a flood risk zone would be subject to restrictions and requirements established by the City's permitting process and would be required to incorporate appropriate City and FEMA flood plain management measures in the design of new buildings, as described in the Floodplain Management Plan and enforced by the Department of Building and Safety.

LETTER I-8

COMMENTER: Brian Trautman

DATE: July 23, 2021

Response I-8.1

The comment states that, to assure affordable housing for everyone, the City needs to ensure adequate housing availability and that policies also serve renters and potential new residents in addition to existing property owners.

The commenter's suggestions are noted, but do not raise issues on the adequacy of the EIR. Objectives under Goal 2 (Housing Preservation and Housing Stability) of the Housing Element Update are divided into three topic areas: strengthening renter protections and preventing displacement, promoting more affordable ownership opportunities and ownership retention strategies, and conserving and improving the quality of housing. No further response is required because the commenter does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see Master Response 4 in Section 3.2.

LETTER I-9

COMMENTER: Eric Preven

DATE: July 28, 2021

Response I-9.1

The comment asks when LADOT and DCP will address the impact of the City's PPD program on workers and visitors. The comment provides a summary of Councilmember Mike Bonin's contributions to implementing the PPD program.

The commenter's question and summary are noted, but do not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2.

LETTERS I-10 THROUGH I-57

Letters I-10 through I-57 were received from separate individuals using Abundant Housing LA's Advocacy Tool but consist of the same template comments related to the Housing Element Update, with minor variations. Rather than respond to each letter individually, the following response has been prepared for all 47 letters since none of the comments raise issues related to the adequacy of the Draft EIR.

COMMENTERS: Refer to individuals I-10 through I-57 listed in Table 3-1

DATES: July 28, 2021 – July 31, 2021

Response for Letters I-10 through I-57

The comment requests that the City target the creation of 300,000 new homes through rezoning and land use reforms, implement a "Fair Share" approach to the Rezoning Program to set specific growth targets for all neighborhoods, increase affordable housing in high-opportunity neighborhoods, expand and merge the City's TOC and Density Bonus programs, and exclude parcels that contain housing units subject to the Rent Stabilization Ordinance (RSO) from the Site Inventory and Rezoning Program.

The commenters' requests for changes to several components of the Housing Element Update are noted, but do not raise issues on the adequacy of the EIR. Please see Master Response 6 in Section 3.2.

LETTER I-58

COMMENTER: Ryan Leaderman

DATE: August 4, 2021

Response I-58.1

The comment describes constraints preventing expeditious housing development, consisting of post-approval second-guessing of entitlements/project details, post-approval covenant acquisitions, and the City not accepting or approving plan check drawings electronically.

The commenter's observations are noted, but do not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2. Nonetheless, under State law, the Housing Element Update must identify programs to alleviate constraints to housing and facilitate production to meet the RHNA. Chapter Six of the Housing Element Update includes several implementation programs which are intended to alleviate identified constraints to housing development, including Program 54, Program 55, and Program 57.

LETTER I-59

COMMENTER: Shenette Holman

DATE: August 8, 2021

Response I-59.1

The commenter urges that the City fix the affordable housing shortage rather than allow the homeless population to grow, provides details regarding their personal life and recent hardship due to the COVID-19 pandemic, and includes the standard message from Abundant Housing LA's Abundant Housing LA's Advocacy Tool (see Letters I-10 through I-57).

The commenter's request is noted, but do not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2. However, the Housing Element Update aims to meet the City's fair share of the regional housing need to accommodate projected population growth and meet existing housing needs within the city; increase the availability of affordable housing and the variety of housing options within the city; and strengthen the City's goals, policies, objectives and programs that prevent displacement, promote homeless prevention and diversion, and promote housing stability. A response for Abundant Housing LA's standard message is included under Responses I-10 through I-57 of this section.

LETTER I-60

COMMENTER: Joann Gioia

DATE: September 2, 2021

Response I-60.1

The comment asks that the City ignore Abundant Housing LA or YIMBY Law's suggestions for the Housing Element Update and adds that there is no need to push high density everywhere or allow duplexes to be built on lots zoned single-family. The comment cites the City Council's resolutions in opposition to Senate Bill (SB) 9 and SB 10, and states that the City needs to have a balance of single- and multi-family homes and that only City residents can decide where it is best to allow density.

The commenter's suggestion is noted, but do not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2.

LETTER I-61

COMMENTER: Bill Cotter

DATE: September 5, 2021

Response I-61.1

The comment expresses concern with the Housing Element Update, and states that there are currently empty beds because homeless individuals choose to live on the street and requests that the City provide assistance for their disabilities. The comment states that building more apartment housing will not address core issues related to homelessness.

The commenter's account of current conditions is noted, but do not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2. However, the Housing Element Update includes objectives under Goal 5 (Preventing and Ending Homelessness) that aim to prevent homelessness and rehouse homeless individuals. No further response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER I-62

COMMENTER: Anna Berberian

DATE: September 5, 2021

Response I-62.1

The comment raises concerns that acceptance of supportive services is not a required condition of accepting housing provided to homeless individuals. The comment states that housing the homeless within communities without proper mental health care puts the community at risk and asserts that it is irresponsible of the City to house untreated individuals in housing in residential areas, rather than in long-term in-patient rehabilitation programs away from the community. The comment states that existing zoning laws and regulations should not be arbitrarily lifted to permit harm to society and that the general population would not carry a "not in my backyard (NIMBY)" attitude if they did not feel that their safety were threatened.

The comment is noted, but do not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2.

LETTER I-63

COMMENTER: Angela Suarez

DATE: September 5, 2021

Response I-63.1

The commenter urges that the City aid with the homeless population issues in North Granada Hills and requests that the City not house homeless individuals in their community close to churches, schools, and parks without addressing the mental health of these individuals. The comment states that the community has seen a surge in the homeless population and claims that they were sent to their community from other areas.

The commenter's request and account of current conditions are noted, but do not but do not raise issues on the adequacy of the EIR. The Housing Element Update includes objectives under Goal 5 (Preventing and Ending Homelessness) that aim to prevent homelessness and rehouse homeless individuals. No further response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see Master Response 4 in Section 3.2.

LETTER I-64

COMMENTER: Lisa Carothers

DATE: September 5, 2021

Response I-64.1

The commenter lists various Housing Element Update policies and programs related to homelessness, and raises concern with the mental health and disabilities of people experiencing homelessness.

The commenter's concerns regarding policies associated with the Housing Element Update are noted, but do not raise issues on the adequacy of the EIR. No further response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see Master Responses 4 and 6 in Section 3.2.

LETTER I-65

COMMENTER: Ann Dorsey

DATE: September 5, 2021

Response I-65.1

The comment states that, although there may be a need for increase housing at all income levels, the City needs to find a way to meet affordable housing needs as their priority or the homeless situation will only worsen.

The comment is noted, but does not raise issues on the adequacy of the EIR. Nonetheless, the Housing Element Update aims to meet the City's fair share of the regional housing need to accommodate projected population growth and meet existing housing needs within the city; increase the availability of affordable housing and the variety of housing options within the city; and strengthen the City's goals, policies, objectives and programs that prevent displacement, promote homeless prevention and diversion, and promote housing stability. No further response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see Master Response 1 and 4 in Section 3.2.

LETTER I-66

COMMENTER: Marie Lipton

DATE: September 6, 2021

Response I-66.1

The comment states that the principle of "Housing First" does not require that homeless individuals enter a treatment program as a condition of accepting housing, and states that the offering of this resources is not enough since it is often refused. The comment states that, while low-income housing for law-abiding people is welcomed, housing the homeless population without dealing with the root cause is putting communities in danger and adds that long-term rehabilitation of these individuals with disabilities needs to occur away from the general population. The comment states that existing zoning laws and regulations cannot be arbitrarily lifted to permit harm to families at the benefit of developers.

The comment is noted, but does not but do not raise issues on the adequacy of the EIR. The commenter has not provided an explanation or supporting evidence as to how changes to zoning laws or regulations would lead to an unsafe community. However, the Housing Element Update includes objectives under Goal 5 (Preventing and Ending Homelessness) that aim to prevent homelessness and rehouse homeless individuals. No further response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see Master Response 4 in Section 3.2.

LETTER I-67

COMMENTER: Jennifer Cox

DATE: September 7, 2021

Response I-67.1

The comment asks that the City not change zoning to allow housing and services for the homeless population. The commenter states that homeless individuals were brought to their community during the start of the COVID-19 pandemic and have been using drugs in public and putting the community in danger.

The commenter's account of current conditions is noted, but does not raise issues on the adequacy of the EIR. Please see Master Response 4 in Section 3.2.

LETTER I-68

COMMENTER: Monica Dragavon

DATE: September 7, 2021

Response I-68.1

The comment states that the principle of "Housing First" does not require that homeless individuals enter a treatment program as a condition of accepting housing, and states that the offering of this resources is not enough since its often refused. The comment states that, while low-income housing for law-abiding people is welcomed, housing the homeless population without dealing with the root cause is putting communities in danger and adds that long-term rehabilitation of these individuals needs to occur away from the general population. The comment states that existing zoning laws and regulations cannot be arbitrarily lifted to permit harm to families at the benefit of developers. The commenter adds that they are opposed to any re-zoning, and asserts that the City can create low-income housing without rezoning and that people of all income levels need to live in a safe and clean community.

The comment is noted, but does not but do not raise issues on the adequacy of the EIR. The commenter has not provided an explanation or supporting evidence as to how changes to zoning laws or regulations would lead to an unsafe community. However, the Housing Element Update includes objectives under Goal 5 (Preventing and Ending Homelessness) that aim to prevent homelessness and rehouse homeless individuals. No further response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see Master Responses 4 and 7 in Section 3.2.

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4 REVISIONS, CLARIFICATION AND CORRECTIONS TO THE DRAFT EIR

As required by California Environmental Quality Act (CEQA) Guidelines Section 15088, this chapter provides corrections or clarifications of certain statements in the Draft Environmental Impact Report (EIR). The correction(s) and/or addition(s) do not constitute significant new information, as defined by CEQA Guidelines Section 15088.5 as they would not result in new significant impacts or a substantial increase in the severity of any impact already identified in the Draft EIR. New information is not significant unless the Draft EIR is changing in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the City has declined to implement.

Corrections or information has been added to the Draft EIR pursuant to CEQA Guidelines Section 15132, as part of the preparation of the Final EIR. Additions to the text of the Draft EIR are shown by underline and deletions to the text of the Draft EIR are shown by ~~strikethrough~~ unless otherwise described. Where revisions are made to Mitigation Measures, those revisions are listed under the relevant impact section; however, the revisions are also intended to apply to the *Executive Summary*. Relevant page numbers in both the applicable impact section and the *Executive Summary* are listed. The following corrections and additions make minor modifications herein and have not been found to affect the impact analysis or conclusions in the Draft EIR.

SECTION 2, EXECUTIVE SUMMARY

Page 2-3 to 2-4 – Revise the discussion text to reflect the updated anticipated development potential in the Inventory of Adequate Sites for Housing, and the associated rezoning need to accommodate the Regional Housing Needs Assessment (RHNA) shortfall, resulting from the revisions described in Section 2 of this Final EIR, as follows:

> The Inventory of Adequate Sites for Housing identifies a total development potential of 230,947 ~~266,647~~ units, which is insufficient capacity to accommodate both the RHNA Allocation of 456,643 units and the City's target capacity of 486,379 units. As a result, the Housing Element identifies a shortfall at all income levels and a total rezoning need of 255,432 ~~219,732~~ units, including rezoning to accommodate a shortfall of 130,553 ~~121,881~~ lower income units, 72,993 ~~72,639~~ moderate income units, and 51,887 ~~25,212~~ above moderate-income units. As a result, the Rezoning Program must create at least 255,432 ~~219,732~~ units of new capacity by October 2024.

SECTION 3, PROJECT DESCRIPTION

Page 3-19 – Revise text and accompanying Table 3-3 to reflect the updated anticipated development potential in the Inventory of Adequate Sites for Housing resulting from revisions described in Section 2 of this Final EIR, as follows:

In total, the Inventory of Adequate sties for Housing identifies a total development potential of 230,947 ~~266,647~~ units during the 6th cycle.

Table 3-3 Summary of Adequate Sites for Housing, by Income Category

Component	Lower Income Units	Moderate Income Units	Above Moderate Income Units	Total Units
Vacant and Underutilized Sites				
Expected Unit Potential	16,955 ~~19,883~~	5,039 ~~5,243~~	20,770 ~~19,706~~	42,764 ~~44,832~~
Warner Center 2035 Specific Plan	0	0	10,491	10,491
Planned and Approved Projects (Development Pipeline)				
Public Land	5,606 ~~5,267~~	12	2,273 ~~2,035~~	7,891 ~~7,314~~
~~Warner Center 2035 Specific Plan~~	~~0~~	~~0~~	~~10,491~~	~~10,491~~
Private Development Projects	18,987 ~~18,858~~	1,352 ~~1,241~~	97,475 ~~123,971~~	117,814 ~~144,070~~
Additional Means of Meeting the RHNA - Non-Site-Specific				
ADU Development	24,592 ~~27,204~~	2,459 ~~2,720~~	13,935 ~~15,416~~	40,987 ~~45,340~~
Project Homekey Expansion	1,000 ~~4,600~~	0	0	1,000 ~~4,600~~
Public Land Programs	5,500	4,500	0	10,000
Total Development Potential	**72,640** **~~81,312~~**	**13,362** **~~13,716~~**	**144,944** **~~171,619~~**	**230,947** **~~266,647~~**

Page 3-20 – Revise the text and accompanying Table 3-4 to reflect the updated pipeline housing development resulting from revisions described in Section 2 of this Final EIR, as follows:

The City conservatively estimates that 117,814 ~~144,070~~ pending, approved or permitted housing development projects that are expected to receive a COO after the beginning of the 2021-2029 planning period and therefore count towards the 6th cycle RHNA need.

Table 3-4 City of Los Angeles Pipeline Housing Units Expected to Receive Certificate of Occupancy (COO) During Sixth Cycle

Project Type	Net Units Added	% Units Expected to Reach COO	Units Expected to Reach COO
Active Planning Entitlements	40,662 ~~175,907~~	64% ~~53%~~	26,025 ~~93,231~~
Approved Planning Entitlements with No Building Permit	84,725 ~~72,537~~	70% ~~58%~~	59,309 ~~42,071~~
By-Right Building Permit Applications (Permit not Issued)	11,575 ~~3,713~~	95%	10,997 ~~3,527~~
Approved Building Permits with No COO (Since April ~~March~~ 2020)[9]	22,145 ~~5,515~~	97% ~~95%~~	21,483 ~~5,240~~
Total	**159,107** **~~257,673~~**		**117,814** **~~144,070~~**

Page 3-20 – Revise the text in footnote 6 to reflect the updated anticipated number of approved housing units that are expected to count towards completion of the RHNA, resulting from the revisions described in Section 2 of this Final EIR, as follows:

> [6] Since the start of the preparation of this EIR, the estimated number of approved housing units that are expected to count towards completion of the RHNA has increased from 36,316 to 80,792 ~~47,312~~. However, for the purposes of this EIR, the analysis will rely on the lower number that was initially included in the NOP. This results in a more conservative analysis of potential environmental impacts for the purposes of CEQA.

Page 3-21 – Revise the discussion text to reflect the updated anticipated development potential in the Inventory of Adequate Sites for Housing, and the associated rezoning need to accommodate the RHNA shortfall, resulting from the revisions described in Section 2 of this Final EIR, as follows:

> The Inventory of Adequate Sites for Housing identifies a total development potential of 230,947 ~~266,647~~ units, which is insufficient capacity to accommodate both the RHNA Allocation of 456,643 units and the City's target capacity of 486,379 units. As a result, the Housing Element identifies a shortfall at all income levels. This results in an identified total rezoning need of 255,432 ~~219,732~~ units, including rezoning to accommodate a shortfall of 130,553 ~~121,881~~ lower income units, 72,993 ~~72,639~~ moderate income units, and 51,887 ~~25,212~~ above moderate-income units. As a result, the Rezoning Program must create at least 255,432 ~~219,732~~ units of new capacity by October 2024.

Page 3-31 – Revise the text in footnote 11 to reflect the updated anticipated number of approved housing units that are expected to count towards completion of the RHNA, resulting from the revisions described in Section 2 of this Final EIR, as follows:

> [11] Since the start of the preparation of this EIR, the estimated number of approved housing units that are expected to count towards completion of the RHNA has increased from 36,316 to 80,792 ~~47,312~~. However, for the purposes of this EIR, the analysis will rely on the lower number that was initially included in the NOP. This results in a more conservative analysis of potential environmental impacts for the purposes of CEQA.

SECTION 4, ENVIRONMENTAL ANALYSIS

Page 4-2 – Revise the discussion text to appropriately generalize the type of residential projects that are likely to require substantial earthwork/ground disturbance during development as follows:

> The aforementioned housing types would vary in size, scale, and location and therefore may lead to different environmental impacts, depending on the type of housing proposed. For example, a 1-10 unit single-family or multifamily residential project in hillside areas ~~are~~ is more likely to require substantial earthwork/ground disturbance, be located in a high fire severity zone, alter existing drainage patterns, and/or conflict with provisions protecting natural/cultural resources, as opposed to a 200-unit multi-family residential development on an infill site in the urban core where development has already occurred and potentially significant impacts tend to be related to the loss of or disruption to cultural/historic resources and the degradation existing resources.

SECTION 4.1, AESTHETICS

Page 4.1-40 – Revise the discussion text to reflect the updated rezoning need resulting from the revisions described in Section 2 of this Final EIR, as follows:

> The Rezoning Program identifies and recommends rezoning for approximately 255,000 ~~220,000~~ units by October 30, 2024.

SECTION 4.2, AIR QUALITY

Pages 4.2-55 to 4.2-56, and 2-11 to 2-12 – Revise Mitigation Measure 4.2-2(a) as follows:

4.2-2(a) Construction Emissions Reduction

For discretionary projects that meet the following criteria, prior to project approval ~~issuance of a permit to construct and at the expense of the project applicant~~, the Applicant ~~City~~ shall be required to provide to the City an Air Quality Impact Analysis prepared by ~~retain~~ a qualified air quality analyst ~~to prepare an Air Quality Impact Analysis~~ to analyze construction emissions and identify necessary mitigation: ~~for any discretionary project that would include either:~~

- demolition of more than 13,500 square feet of building area;
- greater than 5,000 cubic yards of soil cut/fill;
- greater than 5-acres of graded area; or use of more than ten pieces of heavy-duty construction equipment and 150 truck trips (or a total of 6,000 vehicle miles traveled by truck) on any given day during demolition, site clearing, or grading.

The Air Quality Impact Analysis ~~air quality analysis~~ shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are ~~is~~ not limited to, the following mitigation:

- Off-road diesel-powered construction equipment greater than 50 horsepower shall be certified for either the Tier 4 Final emission standards for CARB In-Use Off-Road Diesel-Fueled Fleets Regulations or the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of NOX and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the onsite air quality construction mitigation manager that the use of such devices is not practical for specific engine types.
- All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and ARB or SCAQMD operating permit shall be provided.

- Vehicle idling shall be limited to five minutes as set forth in the California Code of Regulations, Title 13. Signs shall be posted in areas where they will be seen by vehicle operators stating idling time limits.
- ~~Construction contractors shall utilize construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that they are available and feasible to use.~~
- Heavy duty diesel-fueled equipment shall use low ~~NOX~~ NO_x diesel fuel to the extent that it is available and feasible to use.
- Construction haul truck operators for demolition debris and import/export of soil shall use trucks that meet the California Air Resources Board's (CARB) 2010 engine emissions standards at 0.01 grams per brake horsepower-hour of PM and 0.20 grams per brake horsepower-hour of ~~NOX~~ NO_x emissions. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and shall make these records available for inspection upon request by the City of Los Angeles or the South Coast Air Quality Management District (SCAQMD).
- Construction contractors shall utilize construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that they are available and feasible to use.
- ~~Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel powered generators, as feasible, or solar where available.~~
- Equipment such as tower cranes and signal boards shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use for electric tools, equipment, lighting, etc. Construction equipment such as tower cranes and signal boards shall utilize electricity from power poles or alternative fuels (i.e., non-diesel), rather than diesel power generators and/or gasoline power generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.
- Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of commercial availability of such equipment will be made by the City prior to issuance of grading or building permits based on applicant provided evidence of the availability or unavailability of alternative-

fueled generators and/or evidence obtained by the City from expert sources such as construction contractors in the region.

- Consistent with SCAQMD Rule 403, construction contractors shall identify and implement best available dust control measures during active construction operations capable of generating dust.
- Construction contractors shall maintain construction equipment in good, properly tuned operating condition, as specified by the manufacturer, to minimize exhaust emissions. Documentation demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications shall be kept on-site and made available to LADBS inspectors during inspection.
- Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.
- Construction activities shall be discontinued during second-stage smog alerts (when feasible). A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site. If infeasible to stop work, i.e., in the instance of a continuous concrete pour, construction activities shall be limited to those activities necessary to complete the immediate job.
- For projects where continuous pour activities will extend past the typical construction day:
    - Concrete trucks shall have an average capacity of 10 cubic yards to minimize the number of concrete truck trips.
    - Contractor shall use local concrete suppliers with 90 percent or more of the concrete supplied by one or more facilities within a driving distance of less than 5 miles per one-way trip or 10 miles round trip where feasible.
    - Contractor shall be required to use alternatively fueled concrete truck trips that achieve the same or lower NO_x emissions as CNG-fueled concrete trucks to the extent feasible. The level of feasibility/infeasibility shall be approved by the City prior to the beginning of concrete pouring activities.
- During plan check, applicant shall make available to SCAQMD a comprehensive inventory of all of road trucks and concrete trucks to be used for the project, including horsepower rating, engine production year, and certification of the specified equipment.

Pages 4.2-57 and 2-12 – Revise Mitigation Measure 4.2-2(b) as follows:

4.2-2(b) Operations Emissions Reduction

For discretionary projects, prior to project approval ~~issuance of a permit to construct and at the expense of the project applicant~~, the Applicant shall be required to provide the City ~~shall retain a qualified air quality analyst to prepare~~ an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze operational emissions and identify necessary mitigation for any discretionary project that would include more than 462 single-family residential units, 612 multi-family residential units, or any equivalent combination thereof. The Air Quality Impact Analysis ~~air quality analysis~~ shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are ~~is~~ not limited to, the following mitigation:

- Implementation of a Transportation Demand Management Plan.
  - Installation of additional electric vehicle charging stations
  - Public infrastructure improvements (e.g., bus stop shelter improvements)
  - Carpool or ridesharing programs
  - Subsidized transit costs
  - Unbundled parking costs
  - Bicycle amenities (storage, showers, lockers, etc.)
- Use of all-electric appliances (i.e., elimination of natural gas service)
- Use solar or low emission water heaters that exceed Title 24 requirements
- Increased walls and attic insulation beyond Title 24 requirements
- Property management plan that obligates property manager to use of low-VOC paints and coatings, meeting SCAQMD standards, for property management and required use of electric yard and landscaping equipment, including lawnmowers, leaf-blowers, and chainsaws ~~Required use of electric lawnmowers, leaf-blowers, and chainsaws~~

Pg. 4.2-61 – Revise the first full paragraph after quoted MM to read:

"Although the West Yucca project appears to be an outlier and existing regulations, including SCAQMD regulations on diesel trucks, would foreseeably reduce impacts to less than significant, for purposes of conservative analysis…"

Pages 4.2-63 and 2-12 – Revise the second paragraph of Mitigation Measure 4.2-3 as follows:

4.2-3 Construction TAC Reduction Measures

…

Alternatively, no Air Quality Impact Analysis, health risk assessment, and mitigation plan shall be required for discretionary projects conditioned to use construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all equipment rated 50 horsepower or greater. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

SECTION 4.3, BIOLOGICAL RESOURCES

Pages 4.3-46 to 4.3-47 and 2-12 to 2-13 – Revise Mitigation Measure 4.3-1(a) as follows:

4.3-1(a) Biological Resources Reconnaissance Survey and Reporting

For all discretionary projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes of on natural (e.g., native, virgin) or disturbed but undeveloped (e.g., unpaved, areas barren, or ruderal), areas that contain or have the potential to support special-status species, sensitive habitat, or within 300 feet of suitable habitat to support special-status species (e.g., nesting passerines) as determined by the Department of City Planning, including through consultation with ~~and/or~~ CDFW, the project applicant shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of Proposed Project on wildlife corridors. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a

written report substantiating such shall be submitted to Department of City Planning (DCP) prior to project approval ~~issuance of a grading permit~~, and the project may proceed without any further biological investigation. If wildlife corridors are present, the report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.

Pages 4.3-47 to 4.3-48 and 2-13 – Revise Mitigation Measure 4.3-1(b) as follows:

4.3-1(b) Sensitive Species/Habitat Avoidance: Pre-Construction Bird Nest Surveys, Avoidance, and Notification

For all discretionary projects where sensitive species and/or habitat are identified in the biological resources assessment prepared pursuant to MM 4.3-1(a), the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and California Department of Fish and Wildlife (CDFW) prior to ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall ~~also~~ be prepared and submitted to DCP and CDFW following construction.

Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined dependent upon the

species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. ~~A Statement of Compliance signed by the Applicant and Owner is required to be submitted to Los Angeles Department of Building and Safety at plan check and prior to the issuance of any permit.~~ A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective measures conducted shall be prepared by a qualified biologist ~~and shall be submitted to the City within two weeks of project completion~~.

Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

Pages 4.3-48 to 4.3-49 to 4.3-48 and 2-13 to 2-14 – Revise the last sentence of Mitigation Measure 4.3-1(c) as follows:

4.3-1(c) Focused Surveys for Rare Plants

…

The restoration activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP~~,~~ and CDFW~~, and U.S. Fish and Wildlife Service (USFWS), when applicable~~.

Pages 4.3-58 to 4.3-60 and 2-14 – Revise the first and third paragraph of Mitigation Measure 4.3-2(a) as follows:

4.3-2(a) Habitat Mitigation and Monitoring Plan

For discretionary projects that are in areas potentially containing sensitive natural communities or jurisdictional waters and riparian habitat, including streams, wetlands,

riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project, prior to the project approval ~~issuance of grading permits~~, the applicant shall prepare and submit a Habitat Mitigation and Monitoring Program (HMMP), which shall mitigate for impacts to CDFW jurisdictional habitat at a 2:1 ratio for permanent impacts and a 1:1 ratio for temporary impacts, or as otherwise approved by CDFW and the City.

…

The final HMMP shall be developed by a qualified biologist, restoration ecologist or resource specialist and submitted to and approved by the City and CDFW (USACE, RWQCB, if applicable), in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code Section 1602 and supporting regulations, prior to issuance of a grading permit for the project. In broad terms, this Program shall at a minimum include:

Pages 4.3-60 to 4.3-63 and 2-15 to 2-16 – Revise Mitigation Measure 4.3-2(b) as follows:

4.3-2(b) Protected Tree and Tree Canopy Survey

For discretionary projects that include the removal of trees, prior to project approval ~~the issuance of a grading permit~~, a tree report and tree replanting plan shall be conducted by a certified arborist ~~prior to project construction~~ to tag and assess all trees (defined as woody plant material that is five inches or greater in diameter at breast height [DBH – four and a half feet off grade]) subject to the City's Protected Tree Ordinance on the project site. Trees shall be tagged to correspond with a tree exhibit map. Also, the genus and species of the trees, size of the trees at DBH, and structure and vigor of the trees shall be determined, and an evaluation of the trees' resource value (i.e., the biological impacts of the tree removals, potential to be considered wildlife habitat, and locating trees deserving protection) shall be completed. All protected trees shall receive a visual tree assessment (VTA – meaning tree observations shall be from the ground and that no special devises [e.g., increment borers, drills] shall be used). Following the completion of the tree survey, the arborist shall prepare a report that shall at a minimum provide a description of the general character of the trees on the site and identify opportunities and constraints for preservation. The report and tree replanting plan shall be provided to the City for review. As part of the assessment, a plot plan shall also be prepared indicating the location, type, and canopy coverage of all existing trees on the site and within the adjacent public right(s)-of-way.

Based on the results of the tree survey, development plans shall be clustered to maximum extent feasible in order to avoid impacts to sensitive natural communities (e.g., oak woodlands, riparian habitats, extensive tree canopy) and to maintain the largest and most contiguous area of sensitive communities on the site. Additionally, the development plans shall include a proposed minimum buffer to protect adjacent sensitive communities. Development plans that impact sensitive natural communities shall include a detailed feasibility analysis showing how the design has accomplished these avoidance strategies; the City shall not approve development plans until the site design has adequately demonstrated maximum avoidance of sensitive natural communities to the satisfaction of the City Planning-.

Further, removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.

The following measures shall be implemented in addition to those required under the City's Protected Tree Ordinance (Ordinance No. 177,404) to avoid and/or compensate for potential indirect impacts to preserved sensitive natural communities before, during, and following construction activities.

Pre-Construction

- Fencing: Protective fencing at least three feet high with signs and flagging shall be erected around all preserved sensitive natural communities where adjacent to proposed vegetation clearing and grubbing, grading, or other construction activities. The protective fence shall be installed at a minimum of five feet beyond the tree canopy dripline. The intent of protection fencing is to prevent inadvertent limb/vegetation damage, root damage and/or compaction by construction equipment. The protective fencing shall be depicted on all construction plans and maps provided to contractors and labeled clearly to prohibit entry, and the placement of the fence in the field shall be approved by a qualified biologist prior to initiation of construction activities. The contractor shall maintain the fence to keep it upright, taut and aligned at all times. Fencing shall be removed only after all construction activities are completed.
- Pre-Construction Meeting: A pre-construction meeting shall be held between all site contractors and a registered consulting arborist and/or a qualified biologist. All site contractors and their employees shall provide written acknowledgement of their receiving sensitive natural community protection training. This training shall include, but shall not

be limited to, the following information: (1) the location and marking of protected sensitive natural communities; (2) the necessity of preventing damage to these sensitive natural communities; and (3) a discussion of work practices that shall accomplish such.

During Construction

- Fence Monitoring: The protective fence shall be monitored regularly (at least weekly) during construction activities to ensure that the fencing remains intact and functional, and that no encroachment has occurred into the protected natural community; any repairs to the fence or encroachment correction shall be conducted immediately.
- Equipment Operation and Storage: Contractors shall avoid using heavy equipment around the sensitive natural communities. Operating heavy machinery around the root zones of trees would increase soil compaction, which decreases soil aeration and, subsequently, reduces water penetration into the soil. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected zones, unless where specifically approved in writing and under the supervision of a registered consulting arborist and/or a qualified biologist.
- Materials Storage and Disposal: Contractors shall not store or discard any construction materials within the fenced protected zones and shall remove all foreign debris within these areas. The contractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. Contractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (anti-freeze) shall be disposed of properly. The contractors shall ensure that equipment be parked at least 50 feet, and that equipment/vehicle refueling occur at least 100 feet, from fenced protected zones to avoid the possibility of leakage of equipment fluids into the soil.
- Grade Changes: Contractors shall ensure that grade changes, including adding fill, shall not be permitted within the fenced protected zone without special written authorization and under supervision by a registered consulting arborist and/or a qualified biologist. Lowering the grade within the fenced protected zones could necessitate cutting main support and feeder roots, thus jeopardizing the health and structural integrity of the tree(s). Adding soil, even temporarily, on top of the existing grade could compact the soil further, and decrease both water and air availability to the tree roots. Contractors shall ensure that grade changes made outside of the fenced protected zone shall not create conditions that allow water to pond.

- Trenching: Except where specifically approved in writing beforehand, all trenching shall be outside of the fenced protected zone. Roots primarily extend in a horizontal direction forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. A registered consulting arborist shall ensure that all pruning cuts shall be clean and sharp, to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may ultimately result in tree mortality. Use of both root pruning and AirSpade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary.
- Erosion Control: Appropriate erosion control best management practices (BMPs) shall be implemented to protect preserved sensitive natural communities during and following project construction. Erosion control materials shall be certified as weed free.
- Inspection: A registered consulting arborist shall inspect the preserved trees adjacent to grading and construction activity on a monthly basis for the duration of the grading and construction activities. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the registered consulting arborist following each inspection.

Post-construction

- Mulch: The contractors shall ensure that the natural duff layer under all trees adjacent to construction activities shall be maintained. This would stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The contractors shall ensure that the mulch be kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay causing fungal pathogens. Should it be necessary to add organic mulch beneath retained oak trees, packaged or commercial oak leaf mulch shall not be used as it may contain root fungus. Also, the use of redwood chips shall be avoided as certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any added organic mulch added by the contractors shall be applied to a maximum depth of 4 inches where possible.
- Watering Adjacent Plant Material: All installed landscaping plants near the preserved sensitive natural communities shall require moderate to low levels of water. The surrounding plants shall be watered infrequently with deep soaks and allowed to dry out

in-between, rather than frequent light irrigation. The soil shall not be allowed to become saturated or stay continually wet, nor should drainage allow ponding of water. Irrigation spray shall not hit the trunk of any tree. The contractors shall maintain a 30-inch dry-zone around all tree trunks. An above ground micro-spray irrigation system shall be used in lieu of typical underground pop-up sprays.

- Monitoring: A certified arborist shall inspect the trees preserved on the site adjacent to construction activities for a period of two years following the completion of construction. Monitoring visits shall be completed quarterly, totaling eight visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be prepared ~~submitted to the City~~. Additionally, any tree mortality shall be noted and any tree dying during the two-year monitoring period shall be replaced at a minimum 3:1 ratio on-site in coordination with the City.

SECTION 4.4, CULTURAL RESOURCES

Pages 4.4-47 to 4.4-48 and 2-17 – Revise Mitigation Measure 4.4-1(a) as follows:

4.4-1(a) Identification of Built-Environment Historical Resources

For discretionary projects, ~~For any discretionary development project involving a property that is a known or potential historical resource, in accordance with the CEQA Guidelines,~~ the following procedures shall be implemented to identify historical resources, as defined by Public Resources Code Section 21084.1, located on or near a development site and implement appropriate techniques to avoid or reduce significant impacts to historical resources.

~~During the project planning phase, a cultural resources record search shall be conducted via the South Central Coastal Information Center (SCCIC) to determine whether the project area has been subject to previous cultural resources studies and whether historical resources were identified.~~

The City of Los Angeles Historic Resources Survey (SurveyLA) results shall be consulted to determine whether the project area, or adjacent areas, have ~~has~~ been subject to previous cultural resources studies and whether historical resources were identified.

If a development involves the alteration or demolition of a property 45 years of age or older that was ~~has~~ not ~~been~~ evaluated in SurveyLA, including sites with a QQQ code, ~~previously~~ a

historical resources evaluation shall be prepared for the development. The evaluation shall be prepared according to the following standards:

- The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history.
- The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and the City of Los Angeles Office of Historic Resources (OHR) to identify any potential historical resources within the Area of Potential Effects.

Those buildings and structures required to be assessed in a historical resource evaluation ~~All buildings and structures 45 years of age or older~~ not located in an HPOZ shall be evaluated within their historic context and documented in a report meeting the OHP and OHR guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the OHR for review and concurrence. If, as a result of the cultural resources records search or the subsequent historical resources evaluation, it is determined that the proposed development would result in a significant adverse effect to one or more historical resources, appropriate techniques consistent with the Secretary of Interior Standards to avoid or reduce significant impacts to the degree feasible shall be implemented. Measures to reduce impacts shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary under the circumstance (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a mitigation plan ~~report~~ identifying measures for ~~and specifying~~ the treatment or protection of character-defining features ~~and construction activities~~ shall be provided to the City for review. Measures may include but not be limited to mitigation measures 4.4-1(b) to 4.4-1(j) below.

Pages 4.4-48 and 2-17 – Add a new sentence to the beginning of Mitigation Measure 4.4-1(b) as follows:

4.4-1(b) Rehabilitation of Historical Resources

If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.

Pages 4.4-49 and 2-18 – Add a new sentence to the beginning of Mitigation Measure 4.4-1(c) as follows:

4.4-1(c) Design Requirements for New Construction

<u>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</u>

Pages 4.4-49 to 4.4-50 and 2-18 – Revise Mitigation Measure 4.4-1(d) as follows:

4.4-1(d) Relocation and Rehabilitation of Historical Resources

<u>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</u>

For any project for which retention or rehabilitation of a historical resource is not feasible, a feasibility study, subject to City review and approval, shall be prepared weighing the costs, advantages, and disadvantages of relocation, which would preclude the demolition of a resource by removing it intact to another site. If the study concludes it is feasible to relocate the historical resource, the structure's availability shall be advertised in historic preservation websites such as HistoricForSale, Historic Properties, Old Houses, and Preservation Directory and a local newspaper such as the Los Angeles Times for a period of not less than 60 days by the project applicant. Any such relocation efforts shall be undertaken in accordance with a Relocation and Rehabilitation Plan prepared by the party taking possession of the structure to be moved. The Relocation and Rehabilitation Plan shall be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards (PQS) for History, Architectural History, or Architecture, pursuant to 36 CFR 61. The Plan shall include relocation methodology recommended by the National Park Service, which are outlined in the booklet entitled "Moving Historic Buildings," by John Obed Curtis (1979). Upon relocation of the structure to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary's Standards. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to its implementation. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on of the historical resource. If after three months it is evident that no party is interested in purchasing the historical resource per the mitigation measure stipulated above, then the Historic American Building Survey (HABS) Level II documentation, as described below in

Mitigation Measure 4.4-1(c~~d~~), would be required to document the important history and architecture of the historical resource. Relocation shall not take place until the historical resource is first recorded pursuant to the HABS Level II requirements.

Any relocation activities undertaken by third parties shall be fully completed prior to the commencement of construction activities. The relocated historical resource shall be moved in accordance with all applicable regulatory requirements, including those applicable provisions of Chapter 83 of the Los Angeles Building Code, and shall be moved during off-peak hours so as to avoid potential traffic impacts.

Pages 4.4-50 and 2-18 – Add a new sentence to the beginning of Mitigation Measure 4.4-1(e) and revise the following sentence as follows:

4.4-1(e) Historic American Building Survey Documentation

If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.

If significant historical resources are identified on a development site and avoidance or compliance with the Secretary's Standards ~~are~~ is not possible, prior to development activities, the project applicant shall prepare a Historic American Buildings Survey (HABS) Level II documentation for the historical resource and remaining historic property setting.

Pages 4.4-51 and 2-19 – Add a new sentence to the beginning of Mitigation Measure 4.4-1(f) as follows:

4.4-1(f) Interpretive Program

If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.

Pages 4.4-51 and 2-19 – Add a new sentence to the beginning of Mitigation Measure 4.4-1(g) as follows:

4.4-1(g) Construction Monitoring, Salvage, and Reuse

If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.

Pages 4.4-52 and 2-19 – Revise Mitigation Measure 4.4-1(h) as follows:

4.4-1(h) Temporary Protective Relocation

If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.

For projects for which development would have the potential to cause damage to a historical resource and the resource cannot be protected in place, if feasible, the resource may be temporarily relocated to prevent such damage. Prior to development, the applicant shall contact stakeholders directly via letter detailing the location of the project site, its potential impact on the resource, project timeframe, identification of the affected resource, proposed procedures for removal resource or parts of resource with affected, where and for how long the resource would be stored, how it would be secured, and other relevant details. Photographic and documentary recordation of the potentially impacted resource shall be completed by a qualified architectural historian meeting the PQS for Architectural History. Prior to any construction or demolition activities that have the potential to damage the resource, elements that cannot be reasonably protected in place shall be carefully removed by a qualified restoration contractor. Each removed element shall be promptly stored at a secured off-site location. Following completion of project construction, reinstallation of each affected element at its original documented location shall occur [by a qualified restoration contractor] with work completed to the satisfaction of the OHR, and the Department of Public Works Bureau of Engineering, and other interested parties. Excavation and construction activities in the vicinity of the resource and work conducted by the restoration contractor to remove, store, and replace affected elements, shall be monitored by a qualified historic preservation consultant meeting the PQS for Architectural History and documented in a monitoring report that shall be provided to OHR~~, and other interested parties~~.

Pages 4.4-52 and 2-19 to 2-20 – Add a new sentence to the beginning of Mitigation Measure 4.4-1(i) as follows:

4.4-1(i) Excavation and Shoring Plan

If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.

Pages 4.4-54 and 2-20 – Add a new sentence to the beginning of Mitigation Measure 4.4-1(j) as follows:

4.4-1(j) Structural Construction Monitoring

If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.

Pages 4.4-65 to 4.4-67 and 2-21 to 2-22 – Revise Mitigation Measure 4.4-2 as follows:

4.4-2 Archaeological Resources

Discretionary projects that ~~In accordance with the CEQA Guidelines, development projects under the Housing Element Update that may result in impacts to archaeological resources, consisting of those that may~~ involve ground disturbance in native soils or soils of unknown origin, shall implement the following procedures to identify archaeological resources located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.

A. ~~At the time of application for discretionary land use permits or subdivisions that involve disturbances within previously undisturbed native soils, the~~ The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC).

B. If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible.

C. Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define

the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains.

D. Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist.

E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards.

F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (http://ohp.parks.ca.gov/pages/1054/files/armr.pdf).

G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.

H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.

~~I. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.~~

IJ. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

IK. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to

remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

SECTION 4.5, GEOLOGY AND SOILS

Page 4.18 –Revise summary discussion of Mitigation Measures as follows:

Mitigation Measures 4.5-1(a) through 4.5-1(d~~e~~) would minimize potential impacts during excavation activities.

Pages 4.5-23 to 4.5-24 and 2-22 to 2-23 – Revise Mitigation Measure 4.5-1(a) as follows:

4.5-1(a) Paleontological Procedures for Discretionary Projects

For all discretionary projects that involve excavation or grading activities at depths greater than previous disturbance on the respective site(s), prior to the start of construction, the following shall be conducted as discussed in detail below: prepare a resource assessment and records search for the presence of paleontological resources to determine if the project site is underlain by paleontological resources; monitor all excavation and grading activities in areas underlain by soils or geologic units potentially containing paleontological resources; and identify, record, and evaluate all paleontological resources uncovered during project construction and submit a paleontological assessment report to the City for review and approval. In addition, during project construction, the following shall be conducted as discussed in detail below: cease all construction activities in the event of the discovery of paleontological resources; conduct fossil recovery as necessary by a qualified paleontologist; avoid handling of paleontological resources by parties other than the qualified paleontologist responsible for conducting fossil recovery; and resume construction activities only upon clearance by the qualified paleontologist. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less-than-significant level:

- Prior to excavation and grading activities, a qualified paleontologist shall prepare a resource assessment and records search for the potential presence of paleontological resources. This assessment shall be informed by records from the Natural History Museum of Los Angeles County.
- If the assessment determines the project site is underlain by soils or geologic units with a medium to high potential for ~~potentially~~ containing paleontological resources ~~and the project would include ground disturbing activities~~, a qualified paleontologist shall prepare a monitoring plan, and worker education plan. ~~monitor all excavation and grading activities, and shall identify, record, and evaluate the significance of any paleontological finds during construction.~~ The paleontologist's assessment and any required monitoring or required worker education plan shall be submitted to the City for review and approval prior to the commencement of construction activities~~, and construction may not commence until the City has provided approval of the outcome of the paleontologist's assessment of the project site~~. Any monitoring plan shall include requiring compliance with Mitigation Measure 4.5-1(d) for discovery, salvage, and treatment.

- ~~If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and implemented the appropriate course of action in accordance with federal, state, and local guidelines. This may require fossil recovery, described below. Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue.~~
- ~~If fossils are discovered, a qualified paleontologist shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist would have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Handling and disposition of fossils is done at the direction and guidance of a qualified paleontologist.~~
- ~~Personnel of the project shall not collect or move any paleontological resources or associated materials; the identified qualified paleontologist is the only party that shall handle paleontological find(s), including but not limited to collection or removal.~~

- ~~If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s).~~

Pages 4.5-25 to 4.5-26 and 2-23 – Revise Mitigation Measure 4.5-1(b) as follows:

4.5-1(b) Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring

If required by cultural resources assessment under MM 4.5-1(a), prior to the start of construction, a paleontological monitor shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff, and notice that the identified qualified paleontologist is the only one authorized to handle paleontological find(s), including but not limited to collection and removal. Approved plans shall include statement of WEAP requirement.

~~For all discretionary projects located on previously undisturbed land, and for all discretionary projects that would involve excavation of greater than 20 feet deep or excavation for two or more subterranean levels, the following shall be implemented as discussed in detail below: conduct a Paleontological Worker Environmental Awareness Program (WEAP); conduct fossil recovery as necessary by a qualified paleontologist; conduct paleontological monitoring for all ground disturbing activities in undisturbed sediments at depths greater than five feet; and reduce or cease paleontological monitoring only when determined to be appropriate by the qualified paleontologist. During the implementation of these requirements, all reasonable methods shall be used to determine the potential that paleontological resources are present on the project site, including through searches of databases and records, and surveys. If there is a medium to high potential that paleontological resources are located on the project site and it is possible that these resources will be impacted, monitoring will be conducted for all excavation, grading or other ground disturbance activities to identify any resources and avoid potential impacts to such resources. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less than significant level:~~

- ~~**Paleontological WEAP.** Prior to the start of construction, the paleontological monitor shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. In the event of a fossil discovery by construction personnel, the City shall be notified and all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If it is determined~~

~~that the fossil(s) is(are) scientifically significant, the paleontological monitor shall complete the next two steps, for fossil salvage and construction monitoring.~~

- ~~**Fossil Salvage.** The qualified paleontologist or designated paleontological monitor shall recover intact fossils and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor.~~
- ~~**Paleontological Resource Construction Monitoring**. Additional ground disturbing construction activities (including grading, trenching, foundation work and other excavations) in undisturbed sediments at depths greater than five feet is considered to have high paleontological sensitivity, and shall be monitored on a full-time basis by a qualified paleontologist or designated paleontological monitor during ground disturbance, including the initial five feet below the ground surface, as areas with high paleontological sensitivity may contain resources at shallow depths and within the first five feet. If the paleontological monitor determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely; revisions to the monitoring plan shall be submitted to the City for review and approval prior to implementation. Monitoring shall be reinstated if any new or unforeseen deeper ground disturbances are required.~~

Pages 4.5-26 and 2-23 – Add a new Mitigation Measure 4.5-1(c) as follows:

4.5-1(c) Construction Monitoring

If required pursuant to a monitoring plan prepared under MM 4.5-1(a), a paleontologist or designated paleontological monitor shall monitor ground disturbance activities, including the initial five feet below the ground surface, as areas with high paleontological sensitivity may contain resources at shallow depths and within the first five feet. If the paleontological monitor determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated if any new or unforeseen deeper ground disturbances are required. After ground disturbing activities are completed, the paleontologist or designated monitor shall complete

and submit a report to the City verifying compliance with the monitoring plan. Monitoring plan shall show on the plans.

Pages 4.5-26 and 2-23 – Renumber the existing Mitigation Measure 4.5-1(c) and revise as follows:

4.5-1(de) Fossil Discovery, Salvage, and Treatment ~~of Paleontological Resources~~

All discretionary projects shall be subject to the following mitigation measure:

Discovery. If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state, and local guidelines, Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s).

Fossil Salvage and Treatment. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City.

The requirements in this mitigation measure shall be shown on plans.

~~For all projects where known paleontological resources are present and would be disturbed by project activities, and for all projects where the extent of paleontological resources are unknown and paleontological monitoring is conducted in accordance with Mitigation Measures 4.5-1(a) or 4.5-1(b) as provided above, all paleontological resources identified on a project site shall be assessed by a qualified paleontologist and treated in accordance with~~

~~federal, state, and local standards. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City for review and approval. Project activities shall not proceed until the analysis and treatment of on-site paleontological resources has been approved by the City.~~

Page 4.5-26 to 4.5-27 – Revise summary discussion of Mitigation Measures as they relate to analysis of significance of impacts after mitigation as follows:

The implementation of Mitigation Measures 4.5-1(a) through 4.5-1(d~~c~~) to future housing development accommodated by the Housing Element would reduce potential project impacts to paleontological resources and unique geologic units to a less-than-significant level. As discussed in the impact analysis provided above, example projects that have been previously reviewed for CEQA purposes and represent the types of projects that would occur under the Housing Element Update have included mitigation measures to minimize or avoid potential impacts to paleontological resources. Mitigation Measures 4.5-1(a) through 4.5-1(d~~c~~) for the Housing Element Update, as discussed above and summarized below, are comparable to those included in previously approved projects.

- Mitigation Measure 4.5-1(a), Paleontological Procedures for Discretionary Projects, requires that all discretionary projects involving ground disturbance to depths greater than previous disturbance on the subject site(s) are analyzed for paleontological resources, and that construction activities are monitored and reported on for paleontological resources.
- Mitigation Measure 4.5-1(b), *Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring*, requires that all discretionary projects required to comply with Mitigation Measure 5.4-1(a) also include training for construction personnel regarding the appearance of fossils, the proper notifying of and handling of paleontological resources, and a WEAP.
- Mitigation Measure 4.5-1(c), *Construction Monitoring*, requires that, if required pursuant to a monitoring plan, a paleontologist monitors ground disturbance activities during construction.
- Mitigation Measure 4.5-1(d~~c~~), *Fossil Discovery, Salvage, and Treatment ~~of Paleontological Resources~~*, requires that all paleontological resources identified on a project site during implementation of the mitigation measures listed above shall be assessed by a qualified paleontologist and treated in accordance with federal, state, and local standards.

Page 4.5-28 – Revise summary discussion of Mitigation Measures as follows:

Implementation of Mitigation Measures 4.5-1(a) through 4.5-1(d~~c~~) could reduce potential impacts of discretionary projects under the Housing Element Update to paleontological resources, but the measure is not applicable to ministerial projects and impacts may still result with mitigation depending on unusual circumstances.

SECTION 4.7, HAZARDS AND HAZARDOUS MATERIALS

Pages 4.7-84 to 4.7-85 and 2-24 to 2-25 – Revise Mitigation Measure 4.7-2(a) as follows:

4.7-2(a) Environmental Site Assessment

(1) Applicability Threshold. Discretionary projects that require grading, excavation, or building permit from LADBS and which meet the criteria below shall comply with the standard in (2):

- Located on or within 500 feet of a Hazardous Material site listed on the following databases:
  - SWRCB GeoTracker (refer to https://geotracker.waterboards.ca.gov); o DTSC EnviroStor (refer to https://www.envirostor.dtsc.ca.gov/public);
  - DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov);
  - LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/public-records);
  - Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-records-requests);
  - SCAQMD Facility Information Detail (refer to https://xappprod.aqmd.gov/find); or
- Located on or within 500 feet of a Hazardous Materials site designated as a RCRA Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or
- Located on an Oil Drilling District or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by CalGEM (refer to https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx); or
- Located on <u>any</u> land currently or previously designated with an industrial use class or industrial zoning~~, on whole or in part~~; or

- Located on land currently or previously used for a gas station or dry-cleaning facility.

Or:

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

And:

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

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

If the Phase I ESA identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I ESA, a Phase II ESA shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II ESAs shall be maintained by the Applicant and Owner ~~pursuant to the proof of compliance requirements in Section I.D.6~~ and made available for review and inclusion in the case file, as applicable, by the appropriate regulatory agency, such as the SWRCB, DTSC, or LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II ESA or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval be a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained by the Applicant and Owner. ~~pursuant to the proof of compliance requirements in Section I.D.6.~~

SECTION 4.9, LAND USE AND PLANNING

Page 4.9-28 to 4.9-29 – Revise the discussion text to reflect the updated rezoning need resulting from the revisions described in Section 2 of this Final EIR, as follows:

> As discussed in Section 3, *Project Description*, the Housing Element Update includes a program to rezone for the creation of 255,000 ~~220,000~~ additional units of capacity.

SECTION 4.10, NOISE

Pages 4.10-35 and 2-26 – Revise Mitigation Measure 4.10-1(a) as follows:

> ***4.10-1(a) Noise Shielding and Silencing***
>
> For all discretionary projects, power ~~Power~~ construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the Project Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. Measure shall be shown on plans.

Pages 4.10-35 and 2-26 – Revise Mitigation Measure 4.10-1(b) as follows:

> ***4.10-1(b) Use of Driven Pile Systems***
>
> For all discretionary projects, driven ~~Driven~~ (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report. Requirement shall show on plans.

Pages 4.10-35 to 4.10-36 and 2-26 – Revise Mitigation Measure 4.10-1(c) as follows:

> ***4.10-1(c) Enclosures and Screening***
>
> For all discretionary projects, all ~~All~~ outdoor mechanical equipment shall be enclosed or screened from off-site noise-sensitive uses. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment and off-site noise-sensitive uses.

Pages 4.10-36 and 2-26 – Revise Mitigation Measure 4.10-1(d) as follows:

4.10-1(d) Construction Staging Areas

Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. Requirement shall show on plans.

Pages 4.10-36 and 2-26 – Revise Mitigation Measure 4.10-1(e) as follows:

4.10-1(e) Temporary Sound Barriers

Sound barriers, such as temporary walls or sound blankets, shall be erected between construction activities and noise-sensitive uses when construction activities are located within a line-of-sight to and within 500 feet of noise-sensitive uses. Requirement shall show on plans.

Pages 4.10-43 and 2-27 – Revise Mitigation Measure 4.10-2 as follows:

4.10-2 Project-Specific Operational Noise Study

A Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for all discretionary housing developments with roof decks and/or pool decks in the City of Los Angeles concurrent with Design Review and prior to the approval of building permits. The Noise Study shall include:

- Description of pertinent noise regulations.
- Analysis of operational noise generated by the project's roof decks and/or pool decks to noise-sensitive land uses.
- Comparison of noise levels to applicable City thresholds, such as if the project's operational noise would exceed 3 dBA in an unacceptable land use category or 5 dBA in an acceptable land use category per the City's land use compatibility guidelines included in the City of Los Angeles General Plan Noise Element.
- If project noise would exceed City thresholds, identification of mitigation measures to reduce noise to below 3dBA in an unacceptable land use category or 5 dBA in an acceptable land use category to the extent feasible. Mitigation measures may include, but would not be limited to, operational restrictions, sound dampening equipment, or sound walls.
- Each mitigation measure in the Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.

- Applicant/owners shall comply with the mitigation plan and include the measures in construction contracts.
- Mitigation plan shall be included on plans.

Pages 4.10-49 and 2-27 – Revise the last paragraph of Mitigation Measure 4.10-3(a) as follows:

4.10-3(a) Vibration Control Plan

…

A Statement of Compliance, in a form approved by the City, committing the Applicant and Owner to complying with the measure shall be signed by the Applicant and Owner is required to be submitted to the Los Angeles Department of Building and Safety (LADBS) at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above shall be documented by a qualified structural engineer, and shall be provided to the City upon request. Vibration Control Plan shall show on the plans.

Pages 4.10-50 and 2-27 to 2-28 – Revise Mitigation Measure 4.10-3(b) as follows:

4.10-3(b) Vibration Mitigation

For all discretionary projects:

- Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or similar methods are alternatives that shall be utilized where geological conditions permit their use.
- Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment.
- The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices. Requirement to be on plans.

SECTION 4.12, PUBLIC SERVICES

Pages 4.12-27 and 2-28 – Revise the first sentence of Mitigation Measure 4.12-1(a) as follows:

4.12-1(a): Design Plans Review

For discretionary projects with more than 300 housing units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, prior to the start of construction, design plans shall be submitted to the LAFD that demonstrate the use of construction and design features that reduce fire potential and/or promote containment, including increased spacing between buildings, noncombustible roofs, fire-resistant landscaping, and special irrigation facilities.

Pages 4.12-29 and 2-29 – Revise the first paragraph of Mitigation Measure 4.12-1(d) as follows:

4.12-1(d): Submittal of Plot Plan

For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, submittal of a plot plan for approval by the LAFD ~~either prior to the recordation of a final map or the approval of a building permit~~ shall be required. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. In addition, the following recommendations by the LAFD relative to fire safety may ~~shall~~ be incorporated into the building plans:

Pages 4.12-50 and 2-30 – Revise the first sentence of Mitigation Measure 4.12-2(a) as follows:

4.12-2(a): Crime Prevention Unit Consultation

~~Prior to the issuance of a building permit for~~ For a discretionary project with more than 300 units or on a project site of more than 10 acres, the project applicant shall consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime

prevention features appropriate for the design of the project, including applicable features in the Los Angeles Police Department's Design Out Crime Guidelines.

SECTION 4.14, TRANSPORTATION

Page 4.14-52 – Revise the discussion text to reflect the updated anticipated development potential in the Inventory of Adequate Sites for Housing, and the associated rezoning need to accommodate the RHNA shortfall, resulting from the revisions described in Section 2 of this Final EIR, as follows:

Based on the estimated capacity of 230,947 ~~266,647~~ units, and the total target capacity of 486,379 units, the Housing Element finds a need for a Rezoning Program for the creation of 255,432 ~~220,000~~ additional units of capacity

Pages 4.14-64 and 2-32 – Revise the first sentence of Mitigation Measure 4.14-2 as follows:

4.14-2 Transportation Demand Management Program

If a discretionary project will have significant impacts to VMT under LADOT Transportation Assessment Guidelines, the Applicant ~~The Project~~ shall prepare a TDM program to reduce VMT impacts below the City's project threshold to the extent feasible. TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared.

SECTION 4.15, TRIBAL CULTURAL RESOURCES

Pages 4.15-21 to 4.15-22 and 2-33 – Revise Mitigation Measure 4.15-1(a) as follows:

4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects

All discretionary projects that involve ground disturbing activities in previously undisturbed soils, ~~All cultural resource and tribal cultural resource assessment reports prepared~~ shall prepare a cultural resources assessment and do ~~include~~ a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area.

Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written

request to the Department of City Planning to be notified of proposed projects in that area. Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, ~~provided consultation under AB 52 is not required,~~ prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP shall include compliance with MM 4.15-1(b) and will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.

Pages 4.15-23 to 4.15-22 and 2-33 to 2-34 – Revise Mitigation Measure 4.15-1(b) to add a new one-sentence sentence paragraph after the last sentence of the measure, as follows:

4.15-1(b) Discovery of Potential Tribal Cultural Resources

…

Ground Disturbance Activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist.

The measure shall be shown on plans.

SECTION 5, OTHER CEQA CONSIDERATIONS

Page 5-3 to 5-4 – Revise the discussion text to reflect the updated anticipated development potential in the Inventory of Adequate Sites for Housing, and the associated rezoning need to accommodate the RHNA shortfall, resulting from the revisions described in Section 2 of this Final EIR, as follows:

Although the proposed plan is the build out of 420,327 units, the City is only exercising discretion in relation to its policies and programs, including the Rezoning Program, to accommodate approximately 255,000 ~~220,000~~ of those units. The reason for that is the Inventory of Adequate Sites for housing included in the Housing Element Update identifies existing development potential for 230,947 ~~266,647~~ housing units in the City with existing zoning. This leaves a shortfall of approximately 225,000 ~~190,000~~ units requiring a Rezoning Program. However, HCD recommends buffers in the Rezoning Program for those properties that may get redeveloped with non-RHNA development. The proposed Rezoning Program[2]

described in Section 3, Project Description, is to rezone up to approximately 255,000 ~~220,000~~ units.

…

While the City is committing to take discretionary action to rezone to accommodate up to 255,000 ~~220,000~~ housing units that do not already exist, it is not foreseeable that all 255,000 ~~220,000~~ units would get built with housing.

Page 5-7 – Revise reference to mitigation measures related to paleontological resources as follows:

Mitigation Measures 4.5-1(a), 4.5-1(b), 4.5-1(c), and **4.5-1(d~~e~~)** would ensure that potential paleontological resources are identified and either further avoided, or recovered and curated.

SECTION 6, ALTERNATIVES

Page 6-5 – Revise the discussion text to reflect the updated anticipated development potential in the Inventory of Adequate Sites for Housing resulting from the revisions described in Section 2 of this Final EIR, as follows:

The Housing Element Update finds that there is an anticipated development potential of 230,947 ~~266,647~~ housing units that can be accommodated under current zoning in the City; however, it would be speculative to determine the number of units that would occur during the planning period under the No Project Alternative.

Page 6-10 – Revise reference to mitigation measures related to paleontological resources as follows:

Mitigation Measures 4.5-1(a) through **4.5-1(d~~e~~)**, which would minimize potential impacts associated with the proposed Housing Element Update, would not apply.

Page 6-20 – Revise the discussion text to reflect the updated rezoning need resulting from the revisions described in Section 2 of this Final EIR, as follows:

Alternative 2 would accommodate the same amount of housing as the proposed Housing Element Update citywide (420,327 units), including the same number of housing units accommodated by the Rezoning Program (approximately 255,000 ~~220,000~~ units); however, it would change potential locations where these units are likely to occur.

Page 6-27 – Revise reference to mitigation measures related to paleontological resources as follows:

> **Measures 4.5-1(a)** through **4.5-1(d~~c~~)**, which would minimize potential impacts associated with the proposed Housing Element Update, would also apply to this alternative.

SECTION 7, LIST OF PREPARERS

Following page 7-2 – Add the following text to present resumes of listed individuals involved in the preparation of the Draft EIR, which are compiled and attached to this section.

> The following are the resumes of staff listed in Section 7, *List of Preparers*, of the Draft EIR.

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EDUCATION

M.A., Architecture and Urban Planning, UCLA Graduate School of Architecture and Urban Planning

B.A., Urban and Economic Geography, University of Georgia

AFFILIATIONS

American Planning Association

Joe Power

SENIOR PRINCIPAL

Joe Power is a Principal and Planning Manager with Rincon Consultants. He has over 27 years of experience in the planning field and has managed or primarily authored successful planning and environmental and planning studies on projects ranging from affordable housing to urban redevelopment to citywide transportation systems. Mr. Power has prepared numerous CEQA and NEPA environmental documents and is an expert in interpreting state and federal planning and environmental law, as well as in developing environmental documentation that is informative, readable, and legally defensible. He has prepared specialized technical reports on a range of planning and environmental topics, including noise, air quality, greenhouse gases, sustainability, and water supply. Mr. Power is a skilled public presenter and moderator, having facilitated public workshops for various General Plan Elements and EIRs, and conducted professional presentations at both the California and National American Planning Association conferences.

DETAILED PROJECT EXPERIENCE

Principal-in-Charge, Los Angeles County Community Development Commission - CEQA/NEPA Review, Los Angeles County, California
Mr. Power oversees Rincon's contract to provide as needed NEPA/ CEQA documentation and consulting services to the Los Angeles Community Development Commission. He has managed the preparation of the majority of NEPA-required environmental documentation for projects proposed under the CDBG Program within unincorporated Los Angeles County and 48 cooperating cities within the County during this timeframe. Rincon's involvement in this program has included preparation of well over 500 ERR documents prepared in compliance with 24 CFR Part 58. Mr. Power also prepares and provides technical review for the required NEPA documentation for the CDC's Neighborhood Stabilization Program (NSP).

Principal-in-Charge, Citywide Housing Element 2021-2029 and Safety Element Updates Preliminary Study and EIR, City of Los Angeles

Mr. Power oversaw preparation of the Preliminary Study, which helped the City determine the appropriate CEQA document for the Los Angeles Citywide Housing Element 2021-2029 Update. He subsequently oversees the EIR for the project and consistently provides CEQA guidance to City staff and the internal Rincon staff. Mr. Power consistently weighs in on the analysis approach and methodology. His responsibilities include, but are not limited to, attending regular conference calls and coordinating with the external and internal project team.

Principal-in-Charge, City of Avalon General Plan/Local Coastal Plan and EIR, Avalon, California
Mr. Power oversaw the preparation of a Comprehensive Update of the General Plan and Local Coastal Plan, Housing Element Update, and Environmental Impact Report for the City of Avalon, the only incorporated city on the otherwise unincorporated Santa Catalina Island. The focus of the project was to help the City serve the needs of its permanent residents and tourist population while protecting the natural resources that make it a popular destination. As such, the General Plan/Local Coastal and EIR address several issues that are important to the coastal community including environmental conservation, sustainability, and cultural resources.

Principal-in-Charge, Port of Los Angeles Southern California International Gateway Project EIR, Long Beach, California

Rincon provided Peer Review services for the proposed Southern California International Gateway Project EIR. The project was proposed by the Port of Los Angeles and involves the demolition of existing site infrastructure and the construction and operation of 1) new tracks for transfer of marine containers between truck and rail, 2) an administrative building, hostler yard tractor maintenance building, a trailer maintenance building, a crane maintenance area, an air compressor building, fueling areas, and a truck in/out gate; and 3) various rail and roadway infrastructure and site improvements. The peer review of the EIR identified major weaknesses, incorrect conclusions, and potential additional mitigation measures in the document. Rincon's review focused on several key issue areas: project description and associated analysis, air quality, noise, and lighting.

Principal-in-Charge, City of Ventura Comprehensive Plan and EIR, Ventura, California

Mr. Power oversaw Rincon's efforts of the Ventura Comprehensive Plan and EIR. Rincon was part of inter-disciplinary consulting team assisting the City of Ventura with the Comprehensive Plan revision. Our broad role included providing GIS support, environmental and land use analysis, and CEQA documentation, as well as serving as authors of the technical elements (noise, safety, conservation and open space). Rincon provided a detailed GIS analysis that enabled the advisory committee to select targeted growth areas and make critical decisions about adjusting an urban limit line. The plan was particularly complicated because most of the undeveloped periphery of the City is controlled by voter-participation overlays.

Principal-in-Charge, City of Calabasas 2030 General Plan and Development Code Update and EIR, Calabasas, California

Rincon Consultants prepared the 2030 General Plan Update and EIR for the City of Calabasas. The 2030 General Plan update program was designed to build upon the vision and community values that have made Calabasas a special place to live, work, and visit and to address new issues that had emerged since the development of the previous long-range planning program. Key issues in the environmentally conscious community revolved around the preservation of open space, development of new recreational opportunities, and incorporation of sustainability and green building concepts. Rincon's responsibility for this General Plan Update was overall management, public outreach, and development of the updated General Plan Elements, including Land Use (with RRM Design Group), Conservation, Open Space, Noise, Safety, Parks and Recreation, Cultural Resources, and Communication, Technology, and Infrastructure.

Principal-in-Charge, Transit-Oriented Development Pedestrian Master Plan MND, Long Beach, California

Rincon assisted the City of Long Beach with the preparation and circulation of a Negative Declaration for the Downtown and Transit-Oriented Development (TOD) Pedestrian Master Plan. The Master Plan includes: (1) a pedestrian toolkit and best practices for pedestrian design elements; (2) an overview of priority project types; (3) a selection process for individual projects; and (4) a profile of recommended projects. Potential improvements include such items as curb extensions, bioswale parkways, enhanced crosswalks, and traffic circles. Key environmental issues included construction-related traffic, noise, and air quality concerns as well as long-term changes in traffic patterns and levels of service.

Principal-in-Charge, Community Memorial Hospital Master Plan EIR, City of Ventura, Ventura, California

Community Memorial Hospital prepared a master plan to guide future improvements to the existing hospital located in Ventura, California. The master plan involves increasing the overall building area within the new hospital to meet current industry standards with respect to space requirements, including changing code requirements, providing larger private patient rooms, and adequately accommodating outpatient services. The new hospital will be six-stories, approximately 356,000 square feet, which includes 121,000 square feet of non-essential services in the old building for a total of 477,000 square feet. Rincon completed the Community Memorial Hospital Master Plan Environmental Impact Report on behalf of the City of Ventura. The master plan identifies both near-term improvements needed to meet current geotechnical requirements as well as long-term redevelopment goals that involve both the hospital site and neighboring properties. The plan calls for rezoning changes to add "shop frontage type", open space, and street modifications and improvements. Key issues analyzed in the EIR include aesthetics, air quality, historic resources, noise, and traffic/parking.

EDUCATION

Master of Urban Planning, New York University, Robert Wagner Graduate School of Public Service

BA, Geography, University of California, Los Angeles

CERTIFICATIONS/ REGISTRATIONS

American Institute of Certified Planners

Susanne Huerta, AICP

Supervising Environmental Planner

Ms. Huerta is an environmental planner for Rincon's Environmental Sciences and Planning group responsible for managing and preparing environmental and planning documents and technical impact analyses for a variety of projects. She has extensive experience conducting and preparing environmental analyses in accordance with the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA). Her experience includes a wide range of projects for residential, commercial, and community developments, utilities improvements and upgrades, and educational facilities. Ms. Huerta also prepares specialized technical reports on a range of planning and environmental topics, including agriculture, land use, and policy analysis.

SELECT PROJECT EXPERIENCE

Long-Range Planning Projects

Project Manager, City of Los Angeles – Citywide Housing Element Update EIR
Rincon has been retained to prepare CEQA documentation for the 2021-2029 Citywide Housing Element. Ms. Huerta is coordinating with City Staff to prepare a programmatic EIR and has prepared a preliminary study to determine the appropriate CEQA document. This process also includes preparation and distribution of an Initial Study with the Notice of Preparation along with the scoping outreach as required by CEQA a project of regional significance.

Project Manager, City of Los Angeles – Ventura-Cahuenga Boulevard Corridor Specific Plan Amendment, Los Angeles
Rincon prepared an internal preliminary study to determine the CEQA document that should be prepared for the proposed amendments to the Specific Plan. This project is ongoing and primary issues of concern are anticipated to be air quality, noise and transportation.

Project Manager, City of Burbank – Downtown Transit Oriented Development Specific Plan EIR, Burbank
Ms. Huerta is currently coordinating with the Specific Plan team and City staff to prepare a programmatic EIR. Rincon is currently preparing the Initial Study and will assist with the scoping meeting prior to preparation of the EIR.

Project Manager, City of West Hollywood – Housing Element Update EIR
Ms. Huerta is coordinating with the Housing Element team and City staff to prepare a programmatic EIR. Rincon is currently preparing the Initial Study and will assist with the scoping meeting prior to preparation of the EIR.

Project Manager, City of Compton – Compton Artesia Specific Plan EIR, Compton
Ms. Huerta is serving as the Project Manager for this effort. Rincon prepared the EIR for the proposed Specific Plan. The Draft EIR has been circulated to the public which analyzes the potential impacts associated with the anticipated transit-oriented development surrounding the Metro Blue Line Artesia Station. Major issues of concern have included air quality, recreation and transportation.

Development Projects

Project Manager, City of Walnut – The Terraces at Walnut Specific Plan EIR
The proposed Specific Plan involved a mixed-use infill project that included various housing types, a commercial district, parks and recreation areas, and open space, such as landscaped slopes, on 49 acres of vacant land. The major issues of concern were associated with impacts to aesthetics, biological resources, noise and transportation. The project was approved and the EIR was certified in 2019.

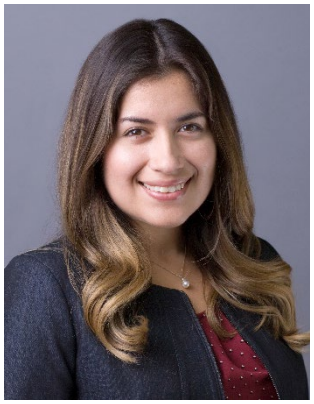
Project Manager, City of Beverly Hills – 9908 S. Santa Monica Project Environmental Impact Report
Ms. Huerta was the Project Manager for an EIR that analyzed a mixed-use residential and commercial development on a vacant site. The major issues of concern were the shade/shadow, noise and transportation impacts to the surrounding residences and the neighboring hotel. The project was controversial, so several public meetings were held by the Planning Commission and City Council. Rincon attended each meeting and supported City staff in addressing the public concerns. The project was approved and the EIR was certified in 2019.

Project Manager, City of Burbank – 777 North Front Street EIR
Rincon was retained by the City to prepare the EIR for the 777 North Front Street project, which involved a mixed-use residential, commercial and hotel along with open space areas. The EIR examined alternatives to the proposed project and also addressed impacts that were identified as potentially significant. Major issues of concern were the on-site hazardous materials and remediation program due to the previous uses of the site, and the significant traffic impacts associated with the proposed project. The project was approved and the EIR was certified in 2019.

Project Manager, City of West Hollywood – 7985 Santa Monica Boulevard EIR
Rincon was retained by the City to prepare the EIR for this mixed-use, adaptive reuse project. The project involved adaptive reuse of the French Market building and construction of a commercial and office building. Major issues of concern included impacts to a historic resource (the French Market building) during construction and operation of the project, as well the potential noise and transportation impacts. The project was approved and the EIR was certified in 2019.

ADDITIONAL PROJECT MANAGEMENT EXPERIENCE

- Los Lirios Mixed Use Project Sustainable Communities Environmental Assessment (SCEA), BRIDGE Housing for the City of Los Angeles
- 414 Crocker Street Project Sustainable Communities Project Exemption (SCPE), East LA Community Corporation for the City of Los Angeles
- 100 North Catalina Avenue EIR, City of Redondo Beach
- 4800 Long Beach Boulevard IS-MND, City of Long Beach
- 5100 Long Beach Boulevard IS-MND, City of Long Beach
- Indus Light Industrial Building IS-MND, City of Chino Hills
- Buddhist Temple IS-MND, City of Chino Hills
- Founders Village Project IS-MND, City of Chino Hills
- Goddard School IS-MND, City of Chino Hills
- 923 Palm Avenue Senior Housing IS-MND, City of West Hollywood
- 3200 East Foothill Boulevard Mixed Use Project SCEA, City of Pasadena
- 9200 Wilshire Boulevard Mixed-Use Project EIR Addendum, City of Beverly Hills
- 100 North Crescent Beverly Hills Media Center EIR, City of Beverly Hills
- 9000 Wilshire Blvd CE, City of Beverly Hills
- First Street Family Apartments IS-MND and NEPA Environmental Assessment (EA), City of Santa Ana
- First American Mixed-Use Project Addendum to the Transit Zoning Code EIR, City of Santa Ana
- 4th Street and Mortimer Project Addendum to the Transit Zoning Code EIR, City of Santa Ana



EDUCATION

BS, Environmental Science,
University of California,
Los Angeles

Vanessa Villanueva

Associate Environmental Planner

Ms. Villanueva is responsible for preparing environmental and planning documents, assisting with public and private sector contract planning services, and providing technical impact analyses for a variety of projects. She has experience preparing and editing environmental analyses in accordance with CEQA and NEPA for infrastructure, housing and urban development, and long-range planning projects. Her recent experience includes projects located in the cities of Los Angeles, Compton, Long Beach, Redondo Beach, Pasadena, San Gabriel, West Covina, and Santa Ana. Her responsibilities include performing research and analysis and/or completing assignments within agency offices and for private sector clients; preparing CEQA and NEPA environmental analyses and technical studies; assisting with the preparation of other comprehensive planning documents; conducting field work necessary to complete high-quality technical noise studies; assisting with in-house English-to-Spanish translations of environmental notices and other public outreach materials; and interacting with various members of public agency and private client staff on matters related to land use planning, CEQA/NEPA compliance, and land development application processing.

SELECT PROJECT EXPERIENCE

Development Projects

Project Manager, Los Angeles County Development Authority – On-Call Environmental Services, Los Angeles County
Ms. Villanueva has managed several Environmental Assessments under NEPA for the Los Angeles County Development Authority, typically consisting of mixed-use affordable housing projects. These projects have included, but are not limited to, the Corazon Del Valle Affordable Housing Project in the Panorama City neighborhood of the City of Los Angeles and the Vermont and Manchester Transit Priority Joint Development Project in the South Los Angeles area of the City of Los Angeles.

CEQA/Noise Analyst/Assistant Project Manager, City of Los Angeles – Citywide Housing Element 2021-2029 and Safety Element Updates Preliminary Study and EIR, Los Angeles County

Ms. Villanueva assisted the City of Los Angeles in preparation of a Preliminary Study to help determine the appropriate CEQA document for the Los Angeles Citywide Housing Element 2021-2029 Update. Ms. Villanueva also assisted in the preparation of the subsequent Draft EIR for the project, taking the lead in analyzing the project's construction and operational noise impacts throughout the city and crafting mitigation measures for future development facilitated by the project. Her responsibilities have included attending regular conference calls and coordinating with City and colleagues to inform and complete the environmental analyses.

Project Manager/Technical Analyst, The Ketter Group – Technical Studies for CEQA Class 32 (In-Fill Development) Categorical Exemptions, Los Angeles

Ms. Villanueva has managed various technical air quality and noise studies for CEQA Class 32 (in-fill development) project applications for multi-family housing projects in the City of Los Angeles. Her responsibilities have included conducting noise-monitoring, technical modeling, and coordinating a team to prepare these studies.

Noise Analyst, City of West Hollywood – West Hollywood Housing Element 2021-2029 Update EIR, West Hollywood
The project consists of a comprehensive update to the City of West Hollywood Housing Element for the 6th Cycle, covering the eight-year planning period from 2021-2029. Her responsibilities included evaluating the noise and groundborne vibration impacts resulting from the construction and operation of reasonably foreseeable development accommodated under the Housing Element Update, including the exposure of noise-sensitive receivers to substantial or incompatible noise levels.

CEQA/Noise Analyst, City of Walnut – Walnut Housing Element Update Addendum, Walnut
Ms. Villanueva assisted in the preparation of an addendum for the City's update to the Housing Element for the 2021-2029 planning period. The proposed Housing Element Update establishes programs, policies, and actions to further the goal of meeting the existing and projected housing needs of all household income levels of the Community, provides evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029. Her responsibilities included coordinating a larger team to complete the addendum and analyzing the project's noise impacts.

CEQA/Technical Analyst, City of Duarte – Duarte Housing and Safety Element Update IS-MND, Duarte
The project involved an update to the Housing Element of the City's General Plan for the 2021-2029 planning period, along with minor updates to the Safety Element, and incorporation of environmental justice goals, policies, and objectives into the City's General Plan. Ms. Villanueva conducted the noise analysis for the project and provided technical review for the analyses prepared for other issue areas in the environmental document.

CEQA/Technical Analyst, City of Redondo Beach – 100-132 North Catalina Avenue Project EIR, Redondo Beach
The project involves demolition or rehabilitation of existing commercial buildings in addition to new construction of townhomes and apartment units on a 1.26-acre site. Ms. Villanueva served as a CEQA and technical analyst during preparation of the Initial Study and EIR for this project. Her responsibilities included conducting noise and vibration modeling, conducting air quality and greenhouse gas emissions modeling, and analyzing other technical project impacts as part of the Initial Study and EIR.

Assistant Project Manager/Noise Analyst, City of Santa Ana – Westview Housing Project IS-MND, Santa Ana
Ms. Villanueva served as an assistant project manager for an IS-MND for construction of 85 apartment units within two 3- to 4-story buildings and 136 parking spaces on a 2.1-acre project site. All units, except the manager's unit, would be designated as affordable housing units. Her responsibilities included internal management of a team and coordination between the team and City staff. Ms. Villanueva also conducted the noise and vibration analysis, including necessary technical modeling, for the IS-MND.

CEQA/Technical Analyst, City of Walnut – The Terraces at Walnut Specific Plan EIR, Walnut
Ms. Villanueva served as a CEQA and technical analyst in assisting the City of Walnut with an EIR for a proposed Specific Plan, which involved a mixed-use infill project that included various housing types, a commercial district, parks and recreation areas, and open space, such as landscaped slopes, on 49 acres of vacant land. The major issues of concern were associated with impacts to aesthetics, biological resources, noise and transportation. Her responsibilities included conducting on-site noise monitoring and drafting the noise and vibration analysis as well as the air quality and greenhouse gases analysis for the EIR.

CEQA/Noise Analyst, City of Burbank – 777 North Front Street Mixed-Use Project EIR, Los Angeles County
Ms. Villanueva served as a CEQA and noise analyst for an EIR for an 8.09-acre mixed-use project that included two multi-story residential buildings, a hotel, retail space, and a landscaped public plaza. Her responsibilities included conducting on-site noise monitoring and drafting the noise and vibration analysis for the EIR. Ms. Villanueva also drafted responses to comments and compiled revisions for the Final EIR.

CEQA/Technical Analyst, City of Compton – Compton Artesia Specific Plan EIR, Los Angeles County
The proposed Specific Plan includes policies and development standards to guide future transit-oriented development on the 103-acre core of the Plan Area within the city of Compton. Ms. Villanueva conducted on-site noise monitoring to inform the EIR analysis. Her other responsibilities included conducting noise and vibration modeling, conducting air quality and greenhouse gas emissions modeling, analyzing other technical project impacts as part of the Initial Study, and developing programmatic mitigation measures to guide future projects enacted under the Specific Plan.

Shannon Carmack

Principal/Architectural History Program Manager

Ms. Carmack has more than 20 years of professional experience providing cultural resources management and historic preservation planning for large-scale and high-profile projects. She has worked throughout California in numerous sectors including local planning, development/construction, public utilities, Department of Defense, transportation, recreation, and education. Ms. Carmack prepares documentation to satisfy CEQA/NEPA, Section 106, and Local Historic Preservation Ordinances. She also provides reports and studies that are in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and the California Historic Building Code. She has developed and implemented successful mitigation for countless projects that included Historic American Building Survey documentation, oral histories, and interpretive programs. Ms. Carmack meets and exceeds requirements in the Secretary of the Interior's Professional Qualification Standards in Architectural History and History. Her experience includes being the Senior Architectural Historian on several projects including the City of Beverly Hills 9006 Wilshire Boulevard Historic Assessment, City of West Hollywood – 7965-7985 Santa Monica Boulevard EIR, and City of West Hollywood – Perry Hotel and Residences Cultural Resources Report.

EDUCATION

BA, History, emphasis in American History, California State University, Long Beach

AA, Anthropology, Orange Coast College; California

CERTIFICATIONS/ REGISTRATIONS

Green Strategies for Historic Buildings, National Preservation Institute

CEQA Workshop Training, AEP

Oral History Methods, CSU Long Beach

Identification and Evaluation of Mid-20th Century Buildings, National Preservation Institute

Section 4(f) Cultural Resources Compliance for Transportation Projects, National Preservation Institute

SELECT PROJECT EXPERIENCE

Principal Architectural Historian, Metropolitan Water District of Southern California – On-Call Environmental Services, Various Counties
Ms. Carmack has served as Principal Architectural Historian for multiple historic building documentation packages for Metropolitan. These documents were completed as part of the cultural resources mitigation adopted for various site and facilities improvements projects and documented significant properties such as filter buildings and washwater reclamation plants. For these efforts, Mr. Carmack served in a senior oversight capacity, coordinating with staff to gather historical photographs, documents, and other materials on behalf of Metropolitan. Reports were subsequently prepared presenting the as-built and existing conditions of the properties, narrative statements of significance, and compiled historical documentation.

Senior Architectural Historian, Various Clients – F.E. Weymouth Treatment Plant Various Projects, Various Counties/Cities, California
Ms. Carmack has completed historic building documentation packages for the Filter Rehabilitation and Chemical Upgrades projects at the F.E. Weymouth Water Treatment Plant. Most recently, Ms. Carmack has led the preparation of a Preliminary Historic Design Review of the Plant Administration and Control Buildings Seismic Upgrades to help inform the appropriate CEQA documentation for the project.

Senior Architectural Historian, City of Oakland – Lakeside Green Streets Improvement Project, City of Oakland
Ms. Carmack served as the Senior Architectural Historian for the pedestrian and bike improvement project, assisting in the preparation of the HPSR and HRER. Ms. Carmack also coordinate with Caltrans District 2 staff and prepared the Finding of No Adverse Effect with Standard Conditions.

Senior Architectural Historian, San Jose State University – Science Building IS-MND, City of San Jose
Ms. Carmack served as Senior Architectural Historian for the project, developing a project approach which sought to demonstrate that the relocation of a historical resources was mitigated to a less than significant impact. Prepared historic impacts report and lead the development of a comprehensive mitigation package that included a historic structures report that demonstrated that the relocation of the historic building was feasible.

Senior Architectural Historian, City of Oakland – Lake Merritt Improvement Project, City of Oakland
Ms. Carmack served as the Senior Architectural Historian for the pedestrian and bike improvement project, assisting in the preparation of the HPSR and HRER. Ms. Carmack also coordinate with Caltrans District 2 staff and prepared the Finding of No Adverse Effect with Standard Conditions.

Senior Architectural Historian, City of Berkeley – John Hinkel Park Cultural Assessment, City of Berkeley
Ms. Carmack served as Senior Architectural Historian for the project to prepare a historic resources assessment of John Hinkel Park and consider potential impacts to the park resulting from proposed park improvements. The scope included a reevaluation of the park, identification of the park's contributing elements, and character-defining features.

Senior Architectural Historian, County of Santa Barbara – Historic Mitigation for the Cavaletto Tree Farm Project, Santa Barbara County
Conducted the historic mitigation package for the project which included a HABS documentation package for the property, historic barn restoration and interpretive plan. Ms. Carmack developed a Historic Structures Report and Treatment plan to preserve and adaptively reuse the barn in conformance with the Standards. Ms. Carmack worked carefully with the team that included a historic architect and structural engineer to fully achieve the project objectives. The interpretive plan included full-color National Park Service style signs which illustrate the history and significance of the property.

Senior Architectural Historian, City of San Gabriel – Chapman's Millrace Relocation and Rehabilitation Cultural Resources Study, Los Angeles County
MS. Carmack was the Senior Architectural Historian for a project to assess, plan and facilitate the removal, relocation and rehabilitation of a segment of a Mission-period water conveyance feature. Chapman's Millrace, constructed by Native Americans in 1821, was uncovered during archaeological excavations across the street from Mission San Gabriel Arcángel during the Alameda Corridor East grade separation project. Ms. Carmack prepared a relocation feasibility analysis, reviewed structural and architectural plans, assisted in preparation of landscape plans, and designed and oversaw installation of all project interpretive signage. She also ensured that all appropriate laws and regulations were met, including compliance with the Secretary of the Interior's Standards for Rehabilitation, Americans with Disabilities Act, California Historic Building Code, as well as all state and local permits. Ms. Carmack managed daily field operations and ensured target goals were met from the project team that included an architect, structural engineer, construction crews, large structure movers and landscapers. Ms. Carmack also maintained communication between the client, the City of San Gabriel, the San Gabriel Mission Church and field subcontractors.

Senior Architectural Historian, County of San Luis Obispo – Del Rio Road Area Specific Plan (Atascadero Walmart) EIR, Atascadero, San Luis Obispo County
Provided architectural history support to identify, document and evaluate several single-family residences located within a redevelopment site. Final documentation included preparation of a report detailing the methods and findings, in accordance with CEQA.

Senior Architectural Historian, City of Los Angeles – Memorial Park Cemetery Rehabilitation Project, Los Angeles County
Ms. Carmack conducted a Historical Structures Report and Treatment Plan for the Harbor View Memorial Park Cemetery, located in San Pedro, City and County of Los Angeles, California. The Historical Structures Report and Treatment Plan included a field survey of the subject property, archival research, a review of project alternatives to improve the cemetery prepared by City of Los Angeles Department of Recreation and Parks, and preparation of a summary report. The report presented the known historical data on the property, identified its character-defining features, and made treatment recommendations for compliance with the Secretary of the Interior's Standards.

David J. Daitch, PhD

Principal/Senior Ecologist/Senior Paleontologist

Dr. David Daitch serves as a Principal, Senior Ecologist and Paleontology Principal Investigator in Rincon's Monterey, California office. He has over 20 years of professional experience providing biological and paleontological environmental services. As a biologist and paleontologist, Dr. Daitch has over 15 years of environmental consulting experience managing projects, coordinating and conducting field surveys, consulting with federal, state and local agencies, and producing and editing technical scientific documents for private industry, regulatory agencies, and publication. Dr. Daitch prepares, and oversees the preparation of technical reports, permit applications, CEQA and NEPA documents, and compliance reports, ensuring proper QA/QC of all environmental documents. He works directly with clients, lead agencies, resource agencies and other stakeholders to ensure successful project execution and submission of high-quality technical documents.

Dr. Daitch manages large scale projects including renewable energy, oil and gas, commercial and residential development, water district projects, transmission and transportation projects, and environmental permitting with various agencies. He has managed project budgets of several million dollars and oversees all aspects of environmental services from front-end constraints analysis to preparation of complex technical documents in support of CEQA and NEPA environmental review, to resource permitting, and construction phase environmental compliance for private developers, and third-party compliance oversight for lead agencies. Dr. Daitch oversees Rincon's renewable energy market sector, and has managed environmental studies, regulatory permitting and compliance on more than 50 renewable energy projects.

EDUCATION

PhD, Ecology & Evolutionary Biology, University of Colorado, Boulder, Colorado

MS, Geology, University of Colorado, Boulder, Colorado

BA, Biology, The Evergreen State College, Olympia, Washington

PERMITS

BLM Paleontological Resources Permit – Principal Investigator

Nevada Permit# N93678

California Permit #CA-16-01P

SELECT PROJECT EXPERIENCE

Paleontologist, RBF Consulting – Magnolia-Plaza Substation Reliability Project, Riverside County

Dr. Daitch functioned as the Senior Paleontologist for this project responsible for preparing a desktop analysis of paleontological resources and conducting an impacts analysis for paleontological resources. The project involved the development of an electrical substation in the City of Riverside, California, in a region where scientifically significant paleontological resources are known to occur. Dr. Daitch reviewed relevant paleontological literature, conducted paleontological localities search with local institutions, and prepared Paleontological Resources Assessment Report. The report consisted of an introduction to the regional and local geology, documentation on the geology and paleontological sensitivity of geologic units within the project site and immediate vicinity, and analysis of the potential for impacts to scientifically significant paleontological resources based on project design and construction plans, and recommendations for mitigating potential impacts to less than significant.

Paleontologist, Flatiron Construction Company – San Onofre to Pulgas Double Tracking Project, City of Oceanside
Dr. Daitch served as the Principal Paleontologist overseeing paleontological resources compliance support. Rincon Consultants was awarded a contract to prepare environmental technical studies to support the soil assessment and remediation of arsenic impacted soil along the San Onofre to Las Pulgas Double Track Stage 1 project in the County of San Diego. Rincon prepared the Excavation and Transportation Plan, Health and Safety Plan, Lead Compliance Plan, Excavation Sampling for Export Materials, Soil Export Plan for the 4.2 mile rail project. In addition, Rincon managed the soil sampling and analytical laboratory analysis of the arsenic impacted soils along the alignment. As a result of the elevated arsenic concentrations detected in soil, Rincon developed and implemented a dust monitoring program to reduce potential health impacts to on-site and off-site environmental receptors. The work program was conducted within budget and met the contractor's schedule.

Principal Paleontologist, County of Santa Barbara – Hollister Avenue, State Street Improvements Environmental Services and EIR/EA Project, Santa Barbara County
Dr. Daitch is currently serving as the Principal Paleontologist for the preparation of required Caltrans technical studies in support of an EIR/EA for the Hollister Avenue - State Street Improvement Project. The project involves roadway and intersection improvements for a 1.25-mile segment of the Hollister Avenue - State Street corridor. Improvements include addition of bicycle, pedestrian, and transit facilities to improve traffic circulation and vehicular and pedestrian safety within the surrounding community. The project proposes two alternatives that widen Hollister Avenue-State Street to four-lane arterial standards and/or two-lane arterial standards.

Principal-in-Charge, TYLin - Santa Cruz County Emergency Repair Permitting Project, Santa Cruz County, California
Dr. Daitch functioned as the Principal-in-Charge and senior regulatory lead for regulatory permitting for a suite of road damage projects in Santa Cruz County. The work program involved preparation of Caltrans Preliminary Environmental Studies (PES), Natural Environmental Studies to support Caltrans review, jurisdictional delineations to support regulatory permitting, and preparation of permit applications for CDFW SAAs, RWQCB section 401 certifications and USACE section 4040 nationwide permits. Dr. Daitch coordinated and oversaw the consultations with the County of Santa Cruz, the TYLin Engineering team, and all regulatory agencies to secure Caltrans approvals and regulatory permits.

Principal-in-Charge, Private Residential Client - Ward Avenue Residential Development Permitting Project, Fort Bragg, California
Dr. Daitch functioned as the Principal-in-Charge and project manager for incidental take permitting for impacts to listed plants on a residential development in Mendocino County. The project involved rare plant surveys, preparation of Section 2081 permit application, a Habitat Mitigation and Monitoring Plan, and a low effect HCP, for federal and state "take" authorization.

Project Manager, Confidential Client/Projects, Kern County California
Dr. Daitch was the project manager and Principal-in-Charge environmental work programs for two solar energy projects in Kern County California. Rincon's scope of work included preparation of technical studies in support of CEQA environmental review, including jurisdictional delineations, cultural resources studies, paleontological resources studies, noise analyses, air quality/greenhouse gas studies and water supply assessments, for projects of up to 500MW (3,500 acres) and up to 700MW (5,000 acres) respectfully. Work was completed to meet County of Kern CEQA standards.

EDUCATION

BFA, Graphics, California State University, Fullerton

AFFILIATIONS

Association of Environmental Professionals

American Planning Association

Deanna M. Hansen

Principal

Ms. Hansen has over 20 years of experience in environmental consulting and has contributed to a wide variety of residential, commercial, and industrial projects. She has developed a well-balance expertise in environmental compliance for a variety of development projects in addition to remediation projects, specializing in CEQA/NEPA compliance. She has developed a level of understanding required to clearly explain technical concepts and issues for public comprehension, particularly for projects that include complex technical analyses and controversial public policy and planning issues. As a Principal with Rincon, Ms. Hansen provides strategic guidance, project oversight, workload and personnel management, training, and serves as a client and agency liaison for projects located throughout California.

Her major clients include state agencies, cities/counties throughout California, ports, developers of residential, commercial, industrial, and mixed-use projects, major hospitals, museums and other cultural organizations, primary and secondary educational facilities. In addition, Ms. Hansen has developed sound working relationships with many state and local agencies along with a solid understanding of their practices, procedures, and preferences.

SELECT PROJECT EXPERIENCE

On-Call Projects

Principal, Housing Authority of the City of Los Angeles (HACLA) – On-Call, Environmental Services, Los Angeles
Ms. Hansen is overseeing the on-call contract with HACLA for environmental services. Tasks include preparing appropriate CEQA/NEPA documents, peer review, technical studies, provide coordination/consultation with stakeholders, and attendance at public hearings.

Principal, City of Long Beach – On-call, Planning & Affordable Housing Consultant Services, Long Beach
Ms. Hansen is providing strategic guidance to the City for environmental services (CEQA/NEPA), technical studies and planning staff services. Environmental services include preparing the appropriate documents for public and private development projects, peer review, preparation of compliance reports, provide expert testimony and provide coordination and consultation with major stakeholders and government agencies. Planning tasks include, but are not limited to, development of planning documents, update of City zoning code, attendance at public hearings and zoning audits.

Principal, City of Santa Ana – Community Development Agency, Santa Ana
Ms. Hansen is providing strategic guidance to the City of Santa Ana Community Development Agency. Rincon has prepared the environmental documentation for a variety of projects including affordable housing developments, parks projects and street improvements. Many of the projects include preparation of the environmental documentation required under NEPA, because the City sought federal funding for the repair work, which needs to be approved by the Department of Housing and Urban Development.

Planning

Principal, Housing Authority of the City of Los Angeles (HACLA) – Rancho San Pedro EIR/EIS, Los Angeles
Ms. Hansen is overseeing the on-call contract with HACLA for environmental services. She is currently providing strategic guidance for the development of the One San Pedro Specific Plan EIR/EIS, which includes the redevelopment of the 21-acre, 478-unit Rancho San Pedro public housing complex. The redevelopment of Rancho San Pedro would positively transform the community for current and future residents while reducing potential displacement of existing residents by expanding housing opportunities. The proposed redevelopment would include demolition of the existing 478-unit Rancho San Pedro complex and construction of new housing with a total of up to 1,390 multi-family residential units for mixed-income households, including rental and homeownership units, 85,000 sf of services, administration and amenities, and 45,000 sf of commercial/retail uses.

Principal, City of Banning – Housing Element Update, Banning
Ms. Hansen is serving as Principal-in-Charge and providing strategic guidance for the 6th Cycle Housing Element Update for the City of Banning. Rincon is working closely with the City to identify sites suitable for future residential development, including sites that will need to be rezoned to accommodate higher densities. Ms. Hansen is currently providing QA/QC and guidance on the CEQA document related to the Housing Element Update.

Principal, City of Oxnard – Housing Element Update, Oxnard
Ms. Hansen is serving as Principal-in-Charge and providing strategic guidance for the 6th Cycle Housing Element Update for the City of Oxnard. Rincon is working closely with the City to identify sites suitable for future residential development, including sites that will need to be rezoned to accommodate higher densities. Ms. Hansen is currently providing QA/QC and guidance on the CEQA document related to the Housing Element Update.

Project Director, County of Kern – Indian Wells Valley Land Use Management Plan (IWVLMP) Program EIR, Mojave Desert
Ms. Hansen provided senior technical review and strategic guidance for the preparation of the IWVLMP Program EIR, which was prepared to identify and evaluate the potential environmental impacts associated with the implementation of the proposed IWVLMP project. The IWVLMP consists of a series of proposed land use changes to the region's General and Specific Plans and changes to zone district classifications that implement zoning. Additionally, the proposed IWVLMP would include changes to the Kern County Zoning Ordinance (Title 19) to address the Lot Size Combining District, as well as the adopted Airport Land Use Compatibility Plan (ALUCP) to more accurately reflect community noise and safety constraints associated with overflight operations from the Naval Air Weapons Station (NAWS) China Lake. Significant environmental issues included aesthetics, agriculture, air quality, greenhouse gas emissions, hydrology and water quality, noise, population and housing, traffic, and utilities and service systems. The Final EIR was certified by the Planning Commission and approved by the Board of Supervisors.

Principal, City of Santa Ana – Community Development Agency, Santa Ana
Ms. Hansen is providing strategic guidance to the City of Santa Ana Community Development Agency. Rincon has prepared the environmental documentation for a variety of projects including affordable housing developments, parks projects and street improvements. Many of the projects include preparation of the environmental documentation required under NEPA, because the City sought federal funding for the repair work, which needs to be approved by the Department of Housing and Urban Development (HUD).

Project Director, City of Pico Rivera – General Plan, Zoning Code Update and Program EIR, Pico Rivera
Ms. Hansen provided strategic guidance for the preparation a comprehensive update of the Pico Rivera General Plan and Zoning Code and preparation of the Program EIR. The City of Pico Rivera is a built out City. A key component of the update is balancing the desire to retain the City's character and maintain its stable neighborhoods, while providing real solutions for the enhancement of opportunity areas and challenges faced by the City. The update includes development of a GIS database system, including the creation of GIS-based land use, zoning, circulation, parks, and trails maps. The zoning update also includes development of design guidelines and a design review process.

Gregory C. Ainsworth

Natural Resources Director

Mr. Ainsworth has over 20 years of experience conducting biological resource assessments on a variety of community development, water, energy, and infrastructure-related projects. He has extensive knowledge of the habitats, from the California deserts to the coastal shoreline. Greg specializes in regulatory and permit compliance associated with the California Environmental Quality Act, Endangered Species Act, Clean Water Act, and other federal, state, and local regulations. Greg has extensive experience managing projects and leading clients through complex regulatory requirements, including various public agency on-call contracts. His technical strengths include biological resource studies, impact analysis, development of mitigation strategies, state and federal wetland and species permitting, and restoration planning. Greg is a horticulturalist and certified arborist, currently providing as-needed arborist consulting services to several public and private entities.

EDUCATION

MA, Environmental Planning, California Polytechnic State University, San Luis Obispo

BS, Environmental Horticulture Science, California Polytechnic State University, San Luis Obispo

CERTIFICATIONS/ REGISTRATIONS

I.S.A. Certified Arborist (Cert# WE 7473A)

I.S.A Qualified Tree Risk Assessor

Qualified Wetland Delineator Trained in California Rapid Assessment Method (CRAM)

PERMITS

California Department of Fish and Game Scientific Collection Permit

SELECT PROJECT EXPERIENCE

Los Angeles Audubon Western Snowy Plover Monitoring Program, Los Angeles County
Greg has been volunteering with the Los Angeles Audubon to provide western snowy plover census survey data at Zuma and Malibu Beaches since 2007. Surveys have consisted of monitoring fall and winter snowy plover populations at specific beaches as well as documenting all shore birds observed during monitoring efforts.

Los Angeles County Department of Public Works (LACDPW), On-Call Environmental Services, Los Angeles County
Greg supported the LACDPW Water Resources Division, Watershed Management Division, and Flood Maintenance Division by providing a full array of environmental services under a 5-year on-call services contract. Greg is providing support with the preparation of regulatory permits (404, 401, and 1602), biological resources surveys and reports, focused surveys for federally- and/or state-listed species, wetland delineations, compliance/ mitigation monitoring and reporting, and preparation of CEQA documents.

Santa Susana Field Laboratory Soil and Groundwater Remediation Cleanup Project, Los Angeles County
Greg managed the preparation of the biological resources section for a Program Environmental Impact Report (PEIR) for the Department of Toxic Substances Control (DTSC) that assessed the potential impacts to biological resources from of soil and groundwater remediation activities within the Santa Susana Field Laboratory. Greg was responsible for conducting an extensive review of literature and databases on biological resources within the cleanup are. The project site is within an important regional wildlife movement corridor that connects the Santa Monica Mountains to the south, via the Simi Hills, and to the Angeles National Forest to the north. Greg assessed both acute and long-term impacts from cleanup activities over a 20- year period on local and regional wildlife movement for large wildlife such as mammals, as well as migratory birds, bats and state and federally listed species. Greg assisted DTSC agency consultation, coordination with various subconsultants, Quality Assurance and Quality Control of the biological resources chapter of the PEIR and assisted with responding to over 500 public comments on biological resources from public citizens and agencies.

City of Long Beach, Los Cerritos Wetlands Oil Consolidation and Restoration Project EIR, Long Beach
Greg managed the preparation of the biological resource section of an EIR for the Los Cerritos Wetlands and Oil Production project in the city of Long Beach. The project includes a comprehensive wetlands restoration that will restore a privately owned oil field in the city of Long Beach through the creation of a wetlands mitigation bank. The project will include the construction of facilities to support oil production and will include a visitor's center and pedestrian paths on the newly restored wetlands. Major environmental topics evaluated in the EIR in addition to biological resources, include cultural resources and historic resources, greenhouse gas, geologic conditions, hazards and hazardous materials, and hydrology and water quality and sea level rise.

City of Calabasas, On-Call Environmental and Arborist Services, Calabasas
Greg serves as an on-call arborist for the City of Calabasas. His services include providing oak tree damage assessments for the Code Enforcement Department, review of oak tree reports prepared by city-approved arborists, and preparation of oak tree damage and appraisal reports. He also prepares biological resource assessments to support CEQA documentation on private development projects within the city.

Newport Trunk Sewer Biological Mitigation Monitoring and Reporting Program, Newport
Greg provided construction monitoring efforts for sensitive biological resources in the area of the Santa Ana River Marsh for the Orange County Sanitation District. Greg assisted in the demarcation of boundaries for construction through the marsh area and conducted breeding surveys for the federally and state-listed Belding's savannah sparrow. He also provided training for the construction workers to ensure they are aware of their responsibilities with regard to protecting sensitive species and habitats in the area.

City of Ventura, Ventura PureWater Project Environmental Impact Report and Permitting, Ventura
Greg prepared a biological resources analysis for an EIR for the City of Ventura evaluating the Ventura Water Supply Projects, which include Ventura PureWater, an indirect potable reuse project that will beneficially use highly treated effluent that is currently being discharged to the Santa Clara River Estuary. Key issues include impacts to sensitive species including the California Steelhead, tidewater goby, and several birds. He managed the analysis of project-related impacts on sensitive biological resource and is preparing a Biological Assessment for the United States Fish and Wildlife Service and the National Marine Fisheries Service on behalf of the City in accordance with Section 7 of the Endangered Species Act.

Trimark Homes North Shore Development, Oxnard
Greg served as the senior biologist and manager of a field biology team on the remediation of a 90-acre oil field waste site in Ventura County that was planned for 270 high-density residential units. He led surveys and the relocation of a resident burrowing owl population and designed and implemented artificial burrows within an on-site designated Ventura marsh milk vetch preserve. He captured silvery legless lizards within on-site dune habitat and relocated them to adjacent coastal dunes. He coordinated with regulatory agencies, provided construction worker education on sensitive resources found on-site, and assisted with the planting of coastal dune vegetation on an artificial dune where long-term soil remediation efforts were still occurring below the surface.

McGrath Wetland Creation and Dune Enhancement, Oxnard
Greg assisted in the design and implementation of wetland restoration and coastal dune enhancement on a 16-acre restoration site located adjacent to Trimark's North Shore Development property. Greg's involvement included ground water monitoring prior to restoration efforts, monitoring of a burrowing owl population, design and installation of wetland and coastal dune vegetation, post-installation monitoring, and oversight of weed management.

Santa Clarita Valley Sanitation District, (SCVSD), Chloride Compliance Facilities Plan and EIR, Los Angeles and Ventura Counties
SCVSD is required to update their facilities plan to comply with the Total Maximum Daily Load (TMDL) limit for chloride adopted by the Los Angeles Regional Water Quality Control Board for the Upper Santa Clara River. Facility updates will include microfiltration/reverse osmosis treatment upgrades and four alternatives for brine disposal, including deep well injection. Greg conducted focused biological resource studies includes a general habitat assessment and plant survey, and he prepared the biological resource section of the EIR for this project. He was also responsible for preparing the Biological Assessment to support Section 7 consultation.

Melissa J. Whittemore

SUPERVISING ENVIRONMENTAL PLANNER

Melissa Whittemore has more than 16 years of experience in the environmental planning field. To date, she has worked on over 100 projects throughout California. Her responsibilities include managing and preparing environmental compliance documents and associated technical studies in accordance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Her clients include federal, state, regional, and local government agencies; water districts; and private companies. Ms. Whittemore specializes in infrastructure projects, including both transportation (e.g., railway tracks and yards, freeways, ports of entry, roadways, bikeways, trails) and utilities (e.g., water and sewer lines, pump stations, reservoirs, recharge basins, wastewater treatment plants). She also regularly works on other types of projects, including residential (ranging from small condominiums to large single-family developments), commercial (large malls, other retail centers, offices), industrial (industrial parks, mining quarries), and institutional (universities/colleges, healthcare clinics, educational/research facilities). Her projects have required a variety of discretionary approvals, including general plan amendments, rezoning, conditional use permits, coastal development permits, specific plans, and tentative subdivision maps. Ms. Whittemore also excels at conducting quality assurance/quality control (QA/QC) reviews on documents prepared by others.

EDUCATION

BS, Biology with an emphasis in Ecology, San Diego State University

Graduate Certificate, National Environmental Policy Act, Utah State University

SELECT PROJECT EXPERIENCE

Imperial Beach Resort, LLC/City of Imperial Beach - Imperial Beach Resort – IS/MND, Imperial Beach
Project Manager responsible for the management and preparation of an IS/MND for a four-story, 100-guest room hotel along the beach with an underground parking area and a sea wall in the City of Imperial Beach in San Diego County. Also managed the preparation of a Biological Technical Report and Cultural Resources Report. Work completed for Imperial Beach Resort, LLC, and the lead agency was the City of Imperial Beach.

Westfield Corporation, Inc./City of Carlsbad - Westfield Carlsbad – EIR, Carlsbad
Senior Environmental Planner responsible for the preparation of a Biological Resources Letter Report for the redevelopment/expansion of the Plaza Camino Real regional shopping center in the City of Carlsbad in San Diego County. Work completed for Westfield Corporation, Inc., and the lead agency was the City of Carlsbad.

County of San Diego - Property Specific Requests General Plan Amendment and Rezone – Subsequent EIR, San Diego
Project Manager responsible for the management and preparation of a Subsequent EIR for the analysis of a General Plan Amendment (GPA) and Rezone of approximately 9,336 acres comprised of numerous parcels throughout unincorporated portions of the County of San Diego. Project included an increase of approximately 1,800 residential dwelling units above that originally allowed by the existing County of San Diego General Plan. The Subsequent EIR also analyzed revisions to the Residential Policy 8 of the Valley Center Community Plan to decrease the minimum lot sizes in two semi-rural residential land use areas.

Hesperia Ventures, LLC - Tapestry Specific Plan – EIR, Hesperia
Senior Environmental Planner responsible for the preparation of an EIR for a mixed-use development on approximately 9,365 acres within the southeastern portion of the City of Hesperia in San Bernardino County. Project included a maximum of 19,396 residential units, two mixed-use town centers, approximately 372 acres of park land, an extensive trail system, nine elementary schools, one middle school, one high school, public and civic facilities (e.g., post office, library branch, fire station, etc.), wastewater treatment facility, and associated infrastructure, as well as preservation of open space. Work completed for Hesperia Ventures, LLC, and the lead agency was the City of Hesperia.

Kearny PCCP Otay 311, LLC - Otay Crossings Commerce Park – Supplemental EIR, San Diego County
Senior Environmental Planner responsible for the preparation of a Supplemental EIR for a 311-acre industrial subdivision within the East Otay Mesa Specific Plan Area in an unincorporated portion of the County of San Diego. Project included the subdivision of land, recordation of open space easements, extension of public and private roadways and utility infrastructure, and reservation of right-of-way for the future SR-11. Key issues included air quality, noise, traffic, hydrology/water quality, and geology/soils. Work completed for Kearny PCCP Otay 311, LLC, and the lead agency was the County of San Diego.

Superior Ready Mix Concrete, LP - Otay Hills Construction Aggregate and Inert Debris Engineered Fill Operation – EIR/EIS
Assistant Project Manager responsible for the management and preparation of an EIR/EIS for a mining quarry in the unincorporated community of East Otay Mesa in south San Diego County. Project site was approximately 434 acres; mining of construction aggregates and materials processing would occur on 110 acres, and 324 acres were placed in biological open space. Project included extraction of approximately 90.9 million tons of mineral resources and over 33 million tons of inert debris over an approximately 120-year period. Key issues included geology, hydrology/water quality, biological resources, cultural and paleontological resources, noise, air quality, traffic, hazards, land use, aesthetics, public services and utilities, climate change, and socioeconomics. Work completed for Superior Ready Mix Concrete, LP, and the lead agencies were the County of San Diego under CEQA and the U.S. Fish and Wildlife Service under NEPA.

United States Bureau of Land Management - West Sacramento Pass Gravel Pit – EA, West Sacramento
Project Manager responsible for the management of a contractor (author) for the preparation of an EA for a gravel mining operation in northeastern Nevada for repaving of a highway. Coordinated and facilitated scoping meetings involving BLM, mining company, and EA author. Ensured that BLM resource specialists met review deadlines. Conducted QA/QC review of EA. The lead agency was the U.S. Bureau of Land Management.

Goodyear Tire & Rubber Company - Goodyear Airship Operations Center Improvements Project IS/MND, Carson
Senior Environmental Planner responsible for the preparation of an IS/MND for modifications to the existing 30-acre Goodyear Airship Operations Center in the City of Caron in Los Angeles County to accommodate a new model of blimp, including an 88-foot-tall, inflatable hangar. Coordinated with the lead agency and project applicant. Work completed for Goodyear Tire & Rubber Company, and the lead agency was the City of Carson.

Metropolitan Airpark, LLC - Metropolitan Airpark Project EA, San Diego
Senior Environmental Planner responsible for the preparation of an EA for impacts associated with issuance of a Section 404 Individual Permit for U.S Army Corps of Engineers jurisdictional areas on the Brown Field Municipal Airport in the community of Otay Mesa in the City of San Diego. Coordinated with another consultant preparing an EA for the Federal Aviation Administration (because the Federal Aviation Administration also had to approve the project). Project included a jet aviation fixed-base operation and supportive aviation and non-aviation facilities such as large and small aircraft hangars, a helicopter fixed-base operation facility, an industrial park, and a commercial center. Work completed for Metropolitan Airpark, LLC, and the lead agency was the U.S Army Corps of Engineers.

EDUCATION

MESM, Water Resources Management; University of California Santa Barbara

BA, Environmental Studies/Film Studies; Emory University

AFFILIATIONS

California Association of Environmental Professionals

Water Education Foundation, Water Leaders Class 2014

Aubrey Mescher, MESM

SENIOR ENVIRONMENTAL PLANNER

Ms. Mescher has 15 years of experience managing and preparing CEQA and NEPA documentation and technical impact analyses for a variety of projects. Ms. Mescher specializes in the analysis and management of water infrastructure projects, and working to meet the needs of water agencies and districts of all sizes. Her technical analysis expertise includes water supply, groundwater resources, hydrology, flood control, drainage pattern alterations, water quality, waste discharge, the use of potentially hazardous materials, and consideration of existing hydrology-related hazards such as landslide and runoff potential. Ms. Mescher is currently managing on-call environmental services contracts for Coachella Valley Water District in Palm Desert and United Water Conservation District in Ventura. Under both of these contracts, Ms. Mescher works closely with agency staff to identify, characterize, and fulfill the environmental services needs associated with providing safe and reliable water supplies to the respective jurisdictions. In addition to managing and preparing CEQA and NEPA analyses, Ms. Mescher is also experienced in other important areas of providing environmental compliance, including providing public outreach support and processes. She is skilled in communicating CEQA/NEPA processes and findings with the public in a variety of venues, including but not limited to public hearings, scoping meetings, and informational workshops.

SELECT PROJECT EXPERIENCE

Project Manager, Coachella Valley Water District – Palm Desert Groundwater Replenishment Project, Riverside County

Ms. Mescher was the Project Manager for the preparation of an Environmental Impact Report and supporting technical studies for this important water supply project, consisting of a groundwater replenishment facility located in Palm Desert, in western Riverside County. Project components include the construction of new detention/infiltration basins, improvement of existing pump stations, construction of a new pump station, and implementation of pipeline extensions. Technical studies prepared for this project include an Air Quality Assessment, Biological Resources Assessment, Cultural Resources Assessment. Ms. Mescher also prepared a Statement of Overriding Considerations, for environmental impacts that were determined in the Environmental Impact Report to be significant and unavoidable in the issue areas of Greenhouse Gases and Hydrology/Water Quality. Additionally, Ms. Mescher provided support with public outreach, meeting coordination and execution, agency coordination, and communication with the Coachella Valley Water District Board of Directors for project consideration. The Final Environmental Impact Report was certified in January 2018. Ms. Mescher is currently assisting Coachella Valley Water District in preparing a Clean Water Act Section 404 Individual Permit in coordination with the U.S. Army Corps of Engineers, to permit Phase II of this project.

Project Manager, United Water Conservation District – Recycled Water Pipelines Project, Ventura County

Ms. Mescher managed the preparation of an Initial Study-Mitigated Negative Declaration for this project, located in western Ventura County. The project consists of expanding the area's existing recycled water system to meet current water demands. It involves two sections of new pipeline that would transmit recycled water generated at the City of Oxnard's Advanced Water Purification Facility. These pipeline

sections are located in local roadways: Riverpark-Saticoy Pipeline (15,000 feet) would extend existing recycled water pipeline in the Riverpark development in Oxnard to groundwater recharge basins in northern Saticoy; and Riverpark-Central Pipeline (4,500 feet) would connect the Riverpark-Saticoy Pipeline to an existing United pipeline in Central Avenue in order convey recycled water to the Pumping Trough Pipeline and Pleasant Valley County Water District customers.

Project Manager, United Water Conservation District – Santa Felicia Dam Safety Improvement Project, Ventura County
Ms. Mescher is providing project management assistance to United Water Conservation District for the ongoing Federal Energy Regulatory Commission non-capacity relicensing process at Santa Felicia Dam. In this capacity, Ms. Mescher is functioning an extension of United Water Conservation District engineering/environmental staff, including with respect to the management of consultants preparing CEQA/NEPA documentation for the project, and coordination with regulatory agencies such as but not limited to Federal Energy Regulatory Commission and National Marine Fisheries Service on behalf of United Water Conservation District. Sensitive issues associated with this project include safety concerns (particularly with the potential for structural failure if the project is not implemented); potential of altered flow releases on the downstream Habitat Conservation Plan area; potential construction-related impacts such as air quality; and safety considerations associated with the presence of large vehicles and equipment.

Project Manager, Water Replenishment District of Southern California – Sativa Well #5 Project & Maywood Avenue Well Treatment System, Los Angeles County
Water Replenishment District assisted the Sativa Los Angeles County Water District (Sativa) with its application for State funds via Water Replenishment District's Safe Drinking Disadvantage Community Program, to provide a wellhead treatment system and supporting facilities for Sativa Well #5. Ms. Mescher managed the preparation of CEQA-Plus documentation consisting of an Initial Study-Mitigated Negative Declaration and biological and cultural technical studies, provided an official FEMA floodplain map of the project area, and assisted Water Replenishment District with Native American consultation in accordance with Assembly Bill 52. In addition, Rincon was retained to prepare CEQA-Plus compliant technical studies for the Maywood Mutual No. 2 Water System Project, which included the construction of a wellhead treatment system for the existing Maywood Avenue Well. Ms. Mescher assisted in the completion of CEQA-Plus documentation and technical analyses, which were completed within short time frames (less than three weeks) for the SRF Application package.

Program Manager, City of Santa Monica – Sustainable Water Infrastructure Project Initial Study-Mitigated Negative Declaration, Santa Monica

Ms. Mescher managed the preparation of CEQA documentation for the Sustainable Water Infrastructure Project in the City of Santa Monica. The Sustainable Water Infrastructure Project consists of three elements: (1) brackish/saline impaired groundwater reuse; (2) recycled water production and conjunctive reuse; and (3) stormwater harvesting and reuse. Together these elements will provide for advance treatment and reuse of brackish/saline-impaired groundwater, recycled municipal wastewater, and stormwater runoff.

Project Manager, City of Bell Gardens – John Anson Ford Park Infiltration Cistern Project, Bell Gardens
Ms. Mescher managed the preparation of CEQA documentation for this project, which involved the construction of an underground water diversion structure and subsurface infiltration basin below John Anson Ford Park, in Bell Gardens. These facilities were designed to capture approximately 400 acre-feet per year of dry weather and first-flush urban stormwater runoff flows and will divert runoff water from the existing storm drain system for pretreatment and groundwater recharge. The primary goal of the project is to improve water quality and achieve receiving Water Quality Objectives for the Rio Hondo watershed portion of the Los Angeles River Upper Reach Watershed Management Area. As part of project management, Ms. Mescher worked closely with the City and engineers to support project design, planned and executed public involvement meetings including providing presentations to explain the CEQA process and project design features, and attended the City Council meeting wherein the project was considered and ultimately approved.

EDUCATION

MHP, Historic Preservation, University of Southern California, Los Angeles

Graduate Certificate Program, Architecture & Urbanism, University of Southern California, Los Angeles

BA, European History, University of California, Santa Cruz

CERTIFICATIONS/ REGISTRATIONS

Meets and exceeds requirements in the Secretary of the Interior's Professional Qualification Standards in Architectural History and History

Steven Treffers, MHP

Senior Architectural Historian

Mr. Treffers is a senior architectural historian with Rincon's Cultural Resources Group with eight years of experience. A native of the San Francisco Bay Area, he received his Bachelor of Arts in History at the University of California, Santa Cruz prior to pursuing a Master's in historic preservation from the University of Southern California, School of Architecture. He meets and exceeds the Secretary of the Interior's Professional Qualification Standards for History and Architectural History and has a wide range of experience with projects requiring historic resources compliance with Section 106 of the National Historic Preservation Act, California Environmental Quality Act, and local ordinances. In addition to his direct experience with bridge improvement projects, Mr. Treffers has been involved in a number of projects in the San Francisco and Monterey Bay areas. For these efforts, Mr. Treffers has managed and conducted historic resource surveys, and coordinated directly with state and local agencies. Both professionally and as a former commissioner on the South Pasadena Cultural Heritage Commission, Mr. Treffers has also worked closely with design teams on projects involving alterations to historic resources to ensure compliance with SOI Standards and applicable design guidelines. As a result, he has extensive experience identifying character-defining features, reviewing architectural drawings, and collaborating with local governments, stakeholders, architects, and engineers to meet project objectives while retaining those elements that convey the reason for a historic resource's significance.

SELECT PROJECT EXPERIENCE

Architectural Historian, County of Los Angeles – LA Plaza de Cultura y Artes Project, City of Los Angeles
As an Architectural Historian, Mr. Treffers performed research and contributed to a report documenting the historical boundaries of the La Plaza Cemetery. He also participated in the update to the NRHP nomination form for the Los Angeles Plaza Historic District. The project involved expert consultation for the treatment of the human remains and cultural resources excavated from the site in accordance with all state and federal laws, including Section 106 of the NHPA, the Native American Graves Protection and Repatriation Act (NAGPRA), NEPA, and CEQA. In addition, project includes updating the Los Angeles Plaza Historic District National Register of Historic Places NRHP nomination form.

Senior Architectural Historian, San Lorenzo Valley Water District – Five Water Pipelines and Swim Tank Projects, Santa Cruz County
Mr. Treffers acted as the Senior Architectural Historian for two projects for the San Lorenzo Valley Water District. Both were subject to Section 106 of the National Historic Preservation Act and CEQA, and included records searches, Native American and local interested parties consultation, intensive-level field surveys, and preparation of technical studies. After an historic property was identified within one of the project sites, Mr. Treffers worked with the federal lead agency to draft a letter to the State Historic Preservation Officer documenting a finding of no adverse effect. The project received State Historic Preservation Officer concurrence and met its expedited schedule as a result.

Senior Architectural Historian, City of Santa Barbara – Cabrillo Boulevard Bicycle and Streetscapes Improvements Project, Santa Barbara
Mr. Treffers was the Senior Architectural Historian for a California Department of Transportation local-assistance program in the city of Santa Barbara. The project, which was subject to Section 106 of the National Historic Preservation Act, included the Montecito Sanitary District wastewater treatment plant within the boundaries of the Area of Potential Effects. Mr. Treffers oversaw the cultural resources study, which included a records search, Native American and local interested parties consultation, intensive-level field survey, and preparation of technical studies. The wastewater treatment plant was evaluated within the context of water infrastructure in California and ultimately recommended ineligible.

Senior Architectural Historian, City of Redondo Beach – Redondo Beach Transit Center, Redondo Beach
This project was a local assistance project in Redondo Beach in support of the development of a transit center. Methods included archival research, coordination with local historic groups and governments, and an intensive-level survey of post-World War II commercial properties. Mr. Treffers provided senior-level oversight for all efforts, which also included preparation of Historical Resources Evaluation Report and Historic Property Survey Report

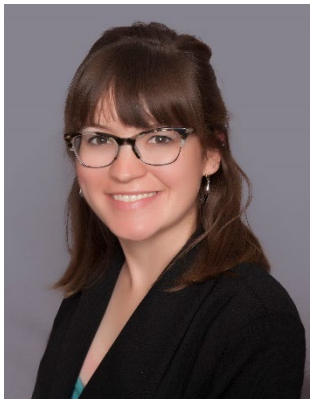
Senior Architectural Historian, Port of Los Angeles – Terminal Island Historic Survey Evaluation and Historic Context Statement, Los Angeles County
The project included a built environment evaluation of properties on Terminal Island, located at the Port of Los Angeles, to identify and assess the significance of historical resources. Efforts included an intensive-level survey, extensive archival research, and development of a Historic Context Statement consistent with SurveyLA, a citywide historic resources survey in the City of Los Angeles. Mr. Treffers assisted in the survey, recordation, and evaluation of numerous industrial properties located in the Port of Los Angeles, as well as contributed to the authorship of the final report.

Architectural Historian, Metropolitan Water District of Southern California – Historic Building Documentation Packages, Southern California
Mr. Treffers has prepared multiple historic building documentation packages for MWD. These documents were completed as part of the cultural resources mitigation adopted for various site and facilities improvements projects and presented the as-built and existing conditions of the properties, narrative statements of significance, and compiled historical documentation.

Architectural Historian, Compton Community College District – Compton Community College Project, Compton
Project involved completing cultural and paleontological resources studies in support of a project at Compton Community College in Compton, California. In addition to completing background research and outreach with Native American groups, project includes conducting an intensive-level survey of the 1953 campus. The survey will evaluate buildings to determine if they are individually eligible for federal and/or state designation, and/or if they contribute to a larger historic district. As the project's Architectural Historian, Mr. Treffers performed background research and intensive-level survey and evaluation.

Architectural Historian, Terry A. Hayes and Associates – Firestone College Master Plan, South Gate
Cultural resources study in support of a project for the East Los Angeles College satellite campus in South Gate, California. The study included field surveys, research, and an assessment of the archaeological and built environment of the project area, which included properties formerly associated with the Firestone Tire and Rubber Company. A historic district was identified through the course of the study and Mr. Treffers subsequently analyzed the project to identify and mitigate potential environmental impacts.

Architectural Historian, Los Angeles Recreation and Parks – Alma Park Historic Resources Evaluation, San Pedro
Historic resources evaluation of 1930s era municipal park in San Pedro Neighborhood that was found eligible as a historic district for the National Register of Historic Places (NRHP). As an Architectural Historian, Mr. Treffers conducted archival research and prepared inventory forms and historic structures evaluation report.



EDUCATION

MA, Anthropology, San Diego State University

BA, Anthropology, University of California, Santa Barbara

REGISTRATIONS

Registered Professional Archaeologist
(ID# 49570646)

Hannah G. Haas, RPA

Archaeologist and Project Manager

Ms. Haas has over nine years of experience working in cultural resources management conducting projects in compliance with CEQA, Section 106 of the National Historic Preservation Act, and NEPA. She has experience in performing archaeological and cultural resources surveys, archaeological testing and monitoring, and the preparation of technical reports. She has worked on hundreds of projects and served as lead author of numerous cultural resources technical reports. Ms. Haas uses her academic training and professional experience to ensure that all cultural resources components of projects are satisfactorily conducted.

SELECT PROJECT EXPERIENCE

Water

Archaeologist, San Lorenzo Valley Water District – Swim Tank Project and Five Water Pipelines Project Initial Study-Mitigated Negative Declaration and U.S. Department of Agriculture Funding Documentation, Santa Cruz County
This project involved replacement of aging water conveyance and storage infrastructure in Santa Cruz County to be funded in part by the U.S. Department of Agriculture Rural Development Program. Ms. Haas oversaw and participated in the preparation of CEQA- and Section 106 of the National Historic Preservation Act-compliant cultural resources documentation, including cultural resources records searches, pedestrian surveys, coordination with local Native Americans, and report preparation.

Archaeologist, County of Monterey – Monterey Storm Drainage System Maintenance Project, Monterey County
The Monterey Storm Drainage System Maintenance Project is intended to remedy agency concerns associated with the City completing maintenance activities without proper regulatory permits or certifications. Work locations include 35 sites throughout the City. Ms. Haas prepared the cultural resources technical study for the project as well as the cultural resources and tribal cultural resources Initial Study-Mitigated Negative Declaration sections. Ms. Haas also assisted with Assembly Bill 52 consultation.

Archaeologist, RMC Water and Environment – Milpitas Recycled Water Pipeline Project, Santa Clara County
Ms. Haas conducted a cultural resources study in compliance with the State Water Resources Control Board's CEQA-Plus requirements. Tasks included conducting a cultural resources records search, Section 106 Native American consultation, and serving as primary author of CEQA-Plus format technical report.

Archaeologist, City of Pismo Beach – Central Coast Blue CEQA-Plus EIR, Pismo Beach
Ms. Haas is serving as the task manager for a cultural resources investigation for Pismo Beach's Central Coast Blue project. The project is an indirect potable reuse project intended to develop a seawater intrusion barrier for the Santa Maria Groundwater Basin and includes an advanced treatment facility, injection wells, monitoring wells, and water distribution and irrigation pipelines. Ms. Haas has overseen such tasks as cultural resources records searches, pedestrian and shovel test pit surveys, coordination with local Native Americans, and report preparation.

Archaeologist, RMC Water and Environment, Tulare Lakes Reservoir Project, Kings County
Ms. Haas conducted a programmatic cultural resources study, including a records search and analysis of potential impacts to cultural resources by a project on a large swath of the former Tulare Lake shoreline in Kings County.

Cultural Resources Specialist and Report Author, K.S. Dunbar and Associates – Eastern Municipal Water District Alessandro Ponds Optimization Project, Riverside County
As Cultural Resources Specialist, conducted a records search, intensive pedestrian survey of the area of potential effect (APE), and prepared the draft report.

Cultural Resources Specialist and Report Author, K.S. Dunbar and Associates – Eastern Municipal Water District Temecula Valley Recycled Water Pipeline Project, Riverside County
As Cultural Resources Specialist, completed a records search, Native American consultation, an intensive pedestrian survey of project alternatives, and prepared a technical report for compliance with Section 106 of the NHPA.

Cultural Resources Specialist and Report Author, K.S. Dunbar and Associates – Eastern Municipal Water District EMWD Perris II Brackish Groundwater Desalter Project, Riverside County
As Cultural Resources Specialist, conducted a records search, completed pedestrian survey of 14 miles of proposed pipeline, and prepared a technical in compliance with Section 106 of the NHPA and CEQA.

Transportation

Archaeologist, PGH Wong Engineering – California High Speed Rail Construction Package 1, Fresno to Merced Section, Fresno and Merced
Ms. Haas manages archaeological tasks, prepares archaeological survey reports, weekly and monthly cultural resources work summary reports, and cultural resources mapping documents.

Cultural Resources Specialist, County of Santa Barbara – Hollister Avenue Widening Project, Goleta and Santa Barbara, Santa Barbara County
As Author, prepared resource documentation and Caltrans style technical reports, including an ASR, HRER, and HPSR, and aided in the preparation of an Archaeological Resources Evaluation Proposal. Excavation at the project site is ongoing. The work is being performed for compliance with Section 106 of the NHPA.

Cultural Resources Specialist, County of Santa Barbara – Clark Avenue Interchange PEAR Project, Santa Barbara County
As Author, prepared resource documentation and Caltrans style technical reports, including an ASR, HRER, and HPSR. The work was performed for compliance with Section 106 of the NHPA.

Cultural Resources Specialist, Psomas Engineering – State Route 1/State Route 166 Intersection Widening and Improvements Project, Santa Barbara County
As Author, prepared resource documentation and Caltrans style technical reports, including an ASR, HRER, and HPSR. The work was performed for compliance with Section 106 of the NHPA.

Cultural Resources Specialist, Psomas Engineering – State Route 166 and Black Road Improvements Project, Santa Maria, Santa Barbara County
As Author, prepared resource documentation and Caltrans style technical reports, including an ASR, HRER, and HPSR. The work was performed for compliance with Section 106 of the NHPA.

Educational Facilities

Project Manager, Livermore Valley Joint Unified School District – Four School Upgrade Projects CEQA Documentation, Livermore Valley
Ms. Haas managed cultural resources tasks, including cultural resources records searches, Native American Heritage Commission coordination, and authorship of the cultural and tribal cultural resources sections of CEQA documents.

EDUCATION

MESc, Yale University, The School of Forestry and Environmental Studies

BA, Environmental Studies, Wellesley College

Professional Certificate in Spanish/English Translation, University of California, San Diego Extension

MEMBERSHIPS/ TRAINING

Member, Association of Environmental Professionals

Member, American Translators Association

Training: Applying the NEPA Process and NEPA Cumulative Effects Analysis and Documentation, The Shipley Group (2015)

American Planning Association National Conference, Phoenix, AZ (2016)

Brenna Vredeveld, MESc

SENIOR BIOLOGIST

Ms. Vredeveld has over 10 years of experience in ecosystem monitoring and reporting, natural resources planning, and federal and local regulatory processes, particularly at the urban-wildland interface. Her diverse work experience includes a broad cross-section of clients and partners in California and Latin America covering long-range natural resource management plans, research, scientific and technical reports, social and environmental assessments, CEQA, NEPA, Endangered Species Act, Clean Water Act, stakeholder consensus facilitation, interdisciplinary collaboration coordination, fieldwork management, and Geographic Information Systems analyses. Her responsibilities include preparation of complex technical reports and integrated planning documents, resource constraints analyses, habitat assessments, agency permitting packages, oversight of fieldwork and subconsultants, management of environmental compliance monitoring, and coordination with regulatory agencies. She advises clients on developing the most appropriate biological resources assessment, compliance, and mitigation strategies for their projects and performs technical quality assurance/quality control of deliverables. For the last nine years she has managed projects for local, state, and federal agencies across southern California's unique habitats. She is fluent in Spanish.

SELECT PROJECT EXPERIENCE

Program Manager, Metropolitan Water District of Southern California (subconsultant to Prime contractor) – Prestressed Concrete Cylinder Pipe Rehabilitation Program, Los Angeles, Orange, and San Bernardino Counties
Ms. Vredeveld served as the Program Manager for the suite of task orders issued for this project. She was responsible for coordinating development of environmental documentation (e.g., technical studies, CEQA analyses, and permitting applications) for biological, cultural, and paleontological resources, and hazardous materials, as well as overseeing general construction monitoring (for the above topics in addition to air quality, surface and stormwater control, noise, and transportation/traffic) for rehabilitation projects along more than 100 miles of five prestressed concrete cylinder pipelines extending through over 30 jurisdictions in Los Angeles, Orange, and San Bernardino Counties in both dense urban and remote rural regions. A total of nine task orders have been awarded to date with additional task orders envisioned for the near future.

CEQA Author, Metropolitan Water District of Southern California – Addendum to the Mitigated Negative Declaration for Palos Verdes Reservoir Relining Project, Rolling Hills Estates
Ms. Vredeveld coordinated the development of the CEQA Addendum under a tight timeline to address additional project activities required to complete upgrades to Palos Verdes Reservoir water storage and conveyance facilities. She also authored the biological resources section. Quick turnaround of the CEQA Addendum allowed the client to continue construction activities without interruption.

Lead Author, Metropolitan Water District of Southern California – Regional Water Quality Control Board Regulatory Process Memorandum, Los Angeles County
Ms. Vredeveld analyzed the Clean Water Act Section 401 Certification processing timeline and cost implications of the Regional Water Quality Control Board's recent

State Wetland Definition and Procedures for Discharge of Dredged or Fill Materials to Waters of the State. The resulting memorandum included example scenarios for large and small projects and highlighted strategies and recommendations.

Biological Resources Lead Author, United Water Conservation District – Water and Energy Reliability Project Initial Study-Mitigated Negative Declaration, Ventura County
Ms. Vredeveld developed the draft biological resources Initial Study-Mitigated Negative Declaration section evaluating potential impacts from the construction, operation, and maintenance of arrays of solar photovoltaic panels and battery storage facilities. This preliminary analysis enabled the client to assess feasibility of desired project components relative to biological resources regulations and to adjust activities as needed to ensure project viability.

Project Manager, City of Los Angeles (subconsultant to Prime contractor) – North Atwater Multimodal Bridge Project, Los Angeles
Ms. Vredeveld served as the Project Manager responsible for writing the Biological Resources Assessment for this pedestrian, bicycle, and equestrian bridge over a soft-bottom portion of the Los Angeles River. She managed compliance monitoring relative to the project's United States Army Corps of Engineers 404 and 408, Regional Water Quality Control Board 401, and California Department of Fish and Wildlife permits, including coordinating full-time biological monitoring during vegetation removal and initial in-water work, fish surveys and placement of fish exclusion block nets around active in-water work areas, nesting bird surveys, and periodic monitoring throughout the project. Ms. Vredeveld collaborated closely with the City of Los Angeles Bureau of Engineering, the construction contractor, and project design team to facilitate implementation of permit conditions and provide guidance on coordination with regulatory agencies. She coordinated with the California Department of Fish and Wildlife on behalf of the City regarding the project's Streambed Alteration Agreement conservation measures and other requirements. She also managed development of the project's Avian Protection Plan, Nesting Bird Management Plan, and Restoration Plan.

Senior Biologist, Southern California Gas Company – Pipeline Safety Enhancement Plan Phase 2, Southern California and Central Valley
Ms. Vredeveld served as the Senior Biologist responsible for preparation of biological resources and land use analyses for pipeline projects (hydrotest, replacement, or valve automation) throughout southern California. Analyses identified potentially significant biological resources (including jurisdictional waters) or land use issues (local permitting needs) that would be affected by or were relevant to proposed pipeline rehabilitation and construction activities. Local land use issues analyzed include requirements of public landholders such as the Bureau of Reclamation, Bureau of Land Management, and National Park Service (Santa Monica Mountains), among others. Project design and activities incorporated these analyses to avoid and minimize potential impacts to the extent feasible. Ms. Vredeveld conducted initial site assessments for biological resources with Southern California Gas Company representatives for several Phase 2 projects in the Central Valley, identifying potential locations of sensitive resources and options for alternative routes.

Project Manager/Lead Author, Marine Corps Base Camp Pendleton – Biomonitoring Services for Upgrades to Communication Systems & Electrical Distribution, Navy Facilities Engineering Command Southwest
Ms. Vredeveld served as the Project Manager and Lead Author responsible for coordinating biomonitoring services for four complex, multi-million dollar linear utilities projects traversing both developed and wildland areas of Camp Pendleton. She managed daily reports from multiple biomonitors on simultaneously ongoing construction sites to draft weekly reports to the client, drawing on detailed knowledge of biological opinions, permits, environmental impact statements, biological assessments, and other regulatory documents. She facilitated interpretation of regulations in collaboration with the Camp Pendleton Environmental Security team to keep construction activities in compliance with all applicable permits, including daily coordination with biological resource monitors and the construction contractor to resolve issues and avoid unnecessary impacts to federally listed species (e.g., California gnatcatcher, least Bell's vireo, tidewater goby, Pacific pocket mouse, Arroyo toad), sensitive habitats, and other regulated resources (e.g., jurisdictional waters, nesting birds). She was the lead author for a 150+ page and a 350+ page final biomonitoring project report presenting monitoring results, analyzing project impacts, and evaluating overall regulatory compliance. Responsibilities also included managing Pacific pocket mouse trapping surveys and writing monthly survey reports.

Tyler Barns, MS

Environmental Planner/Regulatory Specialist

Mr. Barns is a biologist with 15 years of experience within California. As a lead biologist on numerous projects, he has maintained project compliance with many complex permit conditions while facilitating expeditious completion of project goals. He is skilled in recognizing special-status plant and wildlife species and is well versed in the laws protecting them. Mr. Barns has extensive experience preparing biological resources assessments to meet local, state, and federal requirements and address CEQA, NEPA, and the Endangered Species Act. His expertise in the botanical field has led to the successful completion of rare plant surveys and habitat assessments (including Environmentally Sensitive Habitat Area [ESHA] mapping), as well as complex and large-scale wetland and waters determinations. Mr. Barns has extensive experience characterizing and evaluating vegetation communities in rugged and remote terrain. He has also implemented restoration plans for several large-scale restoration projects including installation and adaptive maintenance.

EDUCATION

MS, Environmental Science/Natural Resources, Oregon State University

BS, Environmental Science/Landscape Ecosystems, Humboldt State University

SELECT PROJECT EXPERIENCE

Biologist, City of Los Angeles – Citywide Housing Element Update EIR
Rincon has been retained to prepare CEQA documentation for the 2021-2029 Citywide Housing Element. Mr. Barns is coordinating with City Staff to prepare the biological resources section of the programmatic EIR.

Biologist, City of Calabasas – Citywide Housing Element Update EIR
Rincon has been retained to prepare CEQA documentation for the Citywide Housing Element. Mr. Barns is coordinating with City Staff to prepare the biological resources section of the programmatic EIR.

Project Manager, Ventura County Public Works Agency – Watershed Protection, Santa Ana Boulevard Bridge Replacement Project, Oak View
Assisting Ventura County Public Works Agency with environmental compliance monitoring and reporting services during the Santa Ana Boulevard Bridge Replacement Project. The project involves the replacement of the existing 210-foot-long Santa Ana Boulevard Bridge with a new 350-foot-long, three span concrete box girder bridge on a new upstream alignment situated over the Ventura River. Mr. Barns assisted in obtaining permits for the project while employed by the Ventura County Public Works Agency. He is currently assisting with the environmental compliance monitoring for Rincon.

Senior Biologist, Montecito Water District – Alder Flume Repair Project, Unincorporated Santa Barbara County
Located in the Los Padres National Forest, the previous flume was damaged during the Thomas Fire (2017-2018). As part of the project, Mr. Barns is assisting in obtaining permits for the District in consultation with the U.S. Forest Service and other regulatory agencies.

Project Manager, Santa Barbara County Flood Control Agency – Thomas Fire Debris Flow Repairs East Mountain Drive Bridge Project, Santa Barbara County
Santa Barbara Department of Public Works intends to reconstruct the East Mountain Drive bridge railing which will include replacing concrete, rebar, timber rails, wood collars and grout as well as all necessary hardware. The purpose of the project, as proposed, is to repair, reinforce, and repair the edge of the deck on the north-side of the bridge. Mr. Barns oversaw biological compliance monitoring and reporting services for the project located on East Mountain Drive in the unincorporated community of Montecito, County of Santa Barbara.

Project Manager, Santa Barbara County Flood Control Agency – Santa Monica Debris Basin Project, Santa Barbara County
Mr. Barns is the Project Manager and assisting the Santa Barbara County Flood Control District (District) with bird protection and exclusion services for the Santa Monica Debris Basin Project. The District requested assistance with the protection and exclusion of nesting birds from a bridge and three drain towers to comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) during project implementation. Mr. Barns oversaw the installation of bird netting and construction of temporary swallow housing.

Project Manager, Ventura County Public Works Agency – Watershed Protection, Fresno Canyon Flood Mitigation Project, Casitas Springs
Prior to working with Rincon, Mr. Barns was the Project Manager for the Ventura County Public Works Agency - Watershed Protection on the Fresno Canyon Flood Mitigation Project. The Project reduced repeated flooding in the Casitas Spring community and State Route (SR) 33 by constructing a new storm drain facility, installation of a 9-foot in diameter, reinforced concrete pipe under SR 33 from Fresno Canyon to the Ventura River for conveying stormwater, debris and sediment.

Project Manager, Santa Clarita Valley Water Agency – Phase 2B Recycled Water Tanks Project, Nesting Bird Surveys, Santa Clarita
Mr. Barns oversaw nesting bird surveys for the Phase 2B Recycled Water Tanks Project in Santa Clarita, California. The nesting bird survey was completed pursuant to Mitigation Measure BIO-2 of the Final Supplemental Initial Study-Mitigated Negative Declaration (IS-MND) to comply with the California Environmental Quality Act (CEQA), which required pre-construction surveys for nesting birds and raptors.

Project Manager, Casitas Municipal Water District – Various Operations and Maintenance Projects, Ventura County
Mr. Barns is working directly with the client to understand Casitas' goals, organizational structure, and develops services and solutions to meet Casitas' needs. Services are performed on an "as-needed" basis to support Casitas in the construction and maintenance of water infrastructure projects. Currently managing the West Ojai and Grand Avenue pipeline projects with additional projects forthcoming. He is also tracking the project budget and schedule, coordinating with the client and other engineering consultants working on the project, and organizing Rincon's internal team of technical specialists.

Senior Biologist, Montecito Water District – US 101 Segment 4C Jack and Bore Project, Santa Barbara County
The project involves replace an existing water main and casing underneath US Highway 101 (US 101). The existing water main conflicts with an ongoing California Department of Transportation (Caltrans) widening project in this area. The proposed project would establish a new, lower water main and casing between North Jameson Lane and Fernald Point Lane. As Senior Biologist, Mr. Barns is coordinating technical analyses and leading the permitting efforts. Sensitive issues associated with this project include Environmentally Sensitive Habitat Areas and riparian setbacks.

EDUCATION

BA, Biology, University of Redlands, Redlands

BS, Environmental Science, University of Redlands, Redlands

Destiny Timms

ENVIRONMENTAL PLANNER

Destiny Timms has over a year of experience in environmental impact analysis, completing CEQA related applications, and preparing CEQA notices. She has assisted with the preparation of environmental documents to satisfy CEQA, Clean Water Act, and other federal, State, and local requirements. Her project experience is diverse involving public and private development projects in the fields of transportation, parks/recreation, residential and commercial development, industrial/solid waste, water supply/infrastructure, energy, and other municipal projects.

PROJECT EXPERIENCE

Residential and Planning Projects

- Environmental Planner, City of Highland, Mediterra Residential Project, 2020
- Environmental Planner, City of La Verne, Amherst Residential Project Initial Study and Environmental Impact Report, 2020
- Environmental Planner, City of Santa Ana, Westview Housing Project Initial Study/Mitigated Negative Declaration, 2020
- Environmental Planner, City of West Covina, 1616 West Cameron Avenue Project Initial Study/Mitigated Negative Declaration, 2020
- Environmental Planner, City of Fontana, Ventana Planning Area 6 Addendum, 02/2021
- Environmental Planner, City of Fontana, Ventana Specific Plan Amendment IS and Draft EIR, 02/2021
- Garden Grove Senior Housing Project IS-MND, City of Garden Grove

Industrial Projects

- Environmental Planner and Field Noise Surveyor, City of Redlands, Mountain View Industrial Project Initial Study/Mitigated Negative Declaration, 2020
- Environmental Planner, County of Kern, Malibu Vineyards Industrial Park IS and EIR

Long Range Planning and Housing Elements

- Environmental Planner, City of Los Angeles, Los Angeles Housing Element Update EIR, 2021
- Environmental Planner, City of Corona, Corona Housing Element, 2020
- Environmental Planner, University of California, Riverside, 2021 Long Range Development Plan Environmental Impact Report and Health Risk Assessment, 2020
- Environmental Planner, City of Banning, Banning Housing Element, 2021
- Environmental Planner, City of Beaumont, Beaumont Housing Element Addendum, 2021
- Environmental Planner, City of Calabasas, Calabasas General Plan Update EIR, 2021
- Environmental Planner, City of Palo Alto, Palo Alto Housing Element Update, 2021

Utility Projects

- Environmental Planner, City of Livermore, Sewer Extension IS and EIR, 2021
- Environmental Planner, County of Monterey, Point of Use/ Point of Entry Ordinance Addendum, 2021
- Environmental Planner, City of Santa Paula, Black Walnut Battery Energy Storage System IS-MND, 2021

Permitting and Compliance

- Environmental Planner, Monterey County, Cannabis Permitting for Various Projects, 2021
- Environmental Planner, City of Santa Barbara Montecito Water District, Small Cell Facilities Applications, 2021

Other Projects

- Environmental Planner, City of Los Angeles, Mariachi Plaza SCEA, 2021
- Environmental Planner, Ventura Regional Sanitation District, Toland Optimization Plan Supplemental Environmental Impact Report, 2020
- Environmental Planner, City of Pomona, 3101 West Temple Hotel Expansion, 2021

Lindsay Ellingson, MS, EIT

ENVIRONMENTAL ENGINEER

Ms. Ellingson is a Geological Engineer by training and has over three years of experience in environmental remediation, environmental planning and permitting, water quality regulation and compliance, and water resources engineering. The focus of Ms. Ellingson's master's studies was mitigation of geologic hazards, which included landslide hazard and inundation modeling. Ms. Ellingson is a Project Manager in Rincon's environmental site assessment group and provides technical expertise to several of Rincon's service lines. Ms. Ellingson also has experience with contaminated site investigations, including development of long-term site management strategies, remedial optimization strategies, reporting and management of operation and maintenance activities, and data gap investigations for complex sites.

EDUCATION

MS, Geological Engineering, Michigan Technological University

BS, Geological Engineering, University of Minnesota

CERTIFICATIONS/ LICENCES

Licensed Engineer in Training #1441268

Certified 40-hr HAZWOPER

PROJECT EXPERIENCE

PUBLIC AND PRIVATE DEVELOPMENT PROJECTS

- Campus Pointe Master Plan – Waste Management Plan, City of San Diego, San Diego, California

REMEDIATION PROJECTS

- Vapor Intrusion Former Drapery and Dry Cleaner, Redondo Beach, California
- Soil vapor monitoring, groundwater sampling, and indoor air sampling, Former Dry Cleaner, Huntington Beach, California

ENVIRONMENTAL COMPLIANCE PROJECTS

- Aquatic Pesticides Application Plan – Sampling and Reporting, City of Long Beach, California

SELECT DETAILED PROJECT EXPERIENCE

Project Manager, Operation & Maintenance and Remedial Systems Evaluation, NAVFAC Southwest, Naval Air Weapons Station China Lake
Project manager for five Installation Restoration Program Sites with known VOC and TPH contamination associated with soil, groundwater, and soil vapor. Operation & Maintenance activities included the ongoing operation of a Soil Vapor Extraction unit, various solar powered skimmer units, and a mobile product recovery system. This investigation also included two Corrective Action Plans and a Remedial System Evaluation following the approved Record of Decision for the sites in question. Ms. Ellingson conducted day to day project oversight, managed field activities and scheduling, coordinated with the clients and contractors, reviewed site data, coordinated with DTSC and the Lahontan Regional Water Quality Control Board, and prepared reports with recommendations for system optimization and sustainability.

Assistant Project Manager, Camino Del Mar Bridge Replacement, Del Mar
Assistant project manager for the Project Approvals and Environmental Document phase of a bridge replacement project in the Coastal Zone in Del Mar, California. This investigation included bridge and roadway design, geotechnical investigations and associated permitting, and oversight of technical studies for environmental approvals. Ms. Ellingson conducted project oversight in addition to providing environmental recommendations to structural engineering staff for environmental permitting. Other duties included client coordination, coordination with Caltrans, preparing official meeting summaries and maintaining a record of important project decisions.

Technical Consultant, BKK Remedial Investigation and Feasibility Study, West Covina
Ms. Ellingson assisted with the analysis for and preparation of quarterly monitoring reports for groundwater contamination at the BKK landfill. This analysis included the preparation of groundwater elevation contours; the preparation of contours for contaminants of concern; and the preparation of Piper Diagrams for the purpose of comparing geochemistry data from various areas of the site. Ms. Ellingson took part in a Leachate Investigation report for the site, which included estimating flux rates of Vinyl Chloride across several media. As a part of the geological site assessment, Ms. Ellingson assisted with the preparation of geologic cross-sections using core data and trench logs collected on-site. Ms. Ellingson partook in day-to-day project oversight and coordination with the DTSC client.

Technical Consultant, Stringfellow Superfund Site, Jurupa Valley
Ms. Ellingson led the analysis of perchlorate source differentiation using stable isotope data for Zone 4 of the Stringfellow Superfund Site. This analysis included the use of a three-part mixing model to isolate the likely sources of perchlorate in each distinct region of the project site. This study was a part of a larger Data Gaps Investigation performed for the Remedial Investigation and Feasibility Study at the Stringfellow Superfund Site. Ms. Ellingson also assisted in the preparation of annual reports, which included groundwater elevation contouring as well as contouring of known contaminants of concern.

Assistant Project Manager, I-805/Palm Avenue Interchange Improvements, San Diego
Assistant project manager for the Project Approvals and Environmental Document phase of an interchange improvements project in the City of San Diego. This investigation included the preparation of a joint CEQA NEPA document containing an Initial Study/Mitigated Negative Declaration and Environmental Assessment/Finding of No Significant Impact. Ms. Ellingson frequently coordinated with the City of San Diego, Caltrans, and subconsultants, prepared official Project Development Team meeting summaries, and maintained a record of critical project decisions. The project was approved in October 2019.

Assistant Project Manager, SR-78/Glamis Grade Separated Crossing Feasibility Study, Glamis
Assistant project manager for the SR-78/Glamis Grade Separated Crossing Feasibility Study. This investigation included the investigation of the feasibility of constructing a grade separated crossing for the use of off-highway vehicles in the Imperial Sand Dunes Recreation Area. Ms. Ellingson coordinated with ICTC and key stakeholders in the Technical Working Group to compile existing studies in the area and to prepare a summary of the Problem Statement as characterized by each stakeholder group represented in the Technical Working Group. Ms. Ellingson prepared official Technical Working Group meeting summaries, performed day to day project oversight, and maintained a record of critical project decisions.

Technical Consultant, Gloucester Watershed Management Study, Gloucester, Massachusetts
Ms. Ellingson prepared wildfire and landslide hazard models for the City of Gloucester, Massachusetts as a part of a Watershed Management Study for the area. The investigation included the compilation of data for the region including topographic, climatic, and anthropologic data. The likelihood of wildfire occurrence was assessed and used to identify areas that may result in slope failure following a wildfire that would have a high probability of impacting important surface water bodies in the region. Ms. Ellingson used an infinite slope model to determine the extent of inundation from a landslide occurring post wildfire.

Nikolas Kilpelainen

Associate Environmental Planner

Mr. Kilpelainen is an Associate Environmental Planner within Rincon's Environmental and Land Use Planning Group in the Santa Barbara office. His work includes environmental analysis and review, particularly CEQA and NEPA compliance documentation. He has managed and assisted with preparing Initial Studies, Environmental Impact Reports, Technical Reports, Environmental Assessments and Categorical Exemptions. In these capacities, Mr. Kilpelainen is responsible for public services/utilities analyses, hazards and hazardous materials evaluations, environmental justice and socio-economic analyses, and regional transportation planning/land use studies. Mr. Kilpelainen has experience with the preparation of technical studies for noise, air quality, and greenhouse gas emissions.

EDUCATION

BA, Environmental Studies,
University of San Diego

SELECT PROJECT EXPERIENCE

Environmental Planner, Santa Barbara County Association of Governments – 2040 Regional Transportation Plan and Sustainable Communities Environmental Impact Report, Santa Barbara County
Rincon prepared a Program Supplemental Environmental Impact Report for the SBCAG Fast Forward 2040 Regional Transportation Plan and Sustainable Communities Strategy. The Regional Transportation Plan component includes a list of all transportation improvement projects planned in Santa Barbara County. The Sustainable Communities Strategy identified a countywide land use scenario for the region that would reduce greenhouse gas emissions, primarily through mixed-use development, transit-oriented development, and active transportation modes. Mr. Kilpelainen served as a planner for the SBCAG Fast Forward 2040 RTS/SCS Environmental Impact Report effort. Mr. Kilpelainen prepared sections of the EIR including the Environmental Justice chapter which discussed the potential disproportionate environmental impacts towards sensitive populations in the County

Environmental Planner, Kings County Association of Governments – Regional Transportation Plan and Sustainable Communities Program Environmental Impact Report and Supplemental Program Environmental Impact Report, Kings County
Rincon prepared a Program Environmental Impact Report for the Kings County Association of Governments 2018 Regional Transportation Plan and Sustainable Communities Strategy. The Regional Transportation Plan component includes a list of all transportation improvement projects planned in Kings County. The Sustainable Communities Strategy identifies a countywide land use scenario for the region that would reduce greenhouse gas emissions, primarily through mixed-use development, transit-oriented development, and active transportation modes. Mr. Kilpelainen served as a planner for the KCAG RTP/SCS Environmental Impact Report effort. Mr. Kilpelainen was responsible for preparing the environmental analyses in the document and provided assistant project management efforts.

Environmental Planner, San Joaquin County Association of Governments – Regional Transportation Plan and Sustainable Communities Environmental Impact Report, San Joaquin County
Rincon prepared a Program Environmental Impact Report for the San Joaquin County Association of Governments 2018 Regional Transportation Plan and Sustainable Communities Strategy. The Regional Transportation Plan component includes a list

of all transportation improvement projects planned in Kings County. The Sustainable Communities Strategy identifies a countywide land use scenario for the region that would reduce greenhouse gas emissions, primarily through mixed-use development, transit-oriented development, and active transportation modes. Mr. Kilpelainen served as a planner for the KCAG RTP/SCS Environmental Impact Report effort. Mr. Kilpelainen was responsible for preparing the environmental analyses in the document and provided assistant project management efforts.

Environmental Planner, Kimley-Horn and Associates – Kanan/Agoura Master Intersection Improvements Environmental Impact Report, Agoura Hills
Mr. Kilpelainen is serving as a planner for the Kanan/Agoura Master Intersection Improvements Environmental Impact Report effort. Rincon is preparing a Supplemental EIR to examine the potential environmental effects of the Kanan Road/Agoura Road Ultimate Intersection Improvements Project. The project site is located in the Agoura Village Specific Plan area. The project involves improvements to the existing signalized intersection at Kanan Road/Agoura Road. The high visibility of the Kanan Road/Agoura Road intersection makes the project a challenging and sensitive priority for the City. The aesthetic plan of the intersection improvements is considered essential to the design of the signalized intersection. Goals for the project are for the intersection to serve as a unique focal point or gateway within the city for those traveling to and from the southerly limits of the City and the Santa Monica Mountains; providing improved traffic flow; vehicular, bicycle, and pedestrian access and safety; and aesthetic enhancement.

Environmental Planner, AZALL Services Co. – 28340 Roadside Drive Commercial Project Initial Study-Mitigated Negative Declaration, Agoura Hills
Mr. Kilpelainen is serving as a planner for the 28340 Roadside Drive Commercial Project, for which Rincon is preparing an Initial Study-Mitigated Negative Declaration. The proposed project would include the development of an approximately 3,120-square-foot car wash facility; a seating area associated with the car wash; an approximately 1,250-square-foot retail space adjacent to the carwash; and approximately 10,480 square feet of retail space in two buildings on the western side of the project site. Environmental issues being evaluated include cultural resources, tribal cultural resources, mandatory findings of significance, biological resources, and geology/soils.

Environmental Planner, City of Ventura – Foster Park Intake Structure Initial Study-Mitigated Negative Declaration, Ventura
Mr. Kilpelainen is serving as a planner for the Foster Park Intake Structure project, which would replace aging equipment inside the existing Intake Structure to maintain efficient and reliable water supply for the City of Ventura. Environmental issues being evaluated include biological resources, air quality, and mandatory findings of significance.

Environmental Planner, City of Goleta – Old Town Sidewalk Repair Project Initial Study-Mitigated Negative Declaration, City of Goleta
Mr. Kilpelainen is serving as a planner for the Old Town Sidewalk Repair project, which would include rehabilitation efforts and improve active transportation in Old Town, Goleta. Environmental issues being evaluated include aesthetics, land use and planning, stormwater management, and biological resources.

ADDITIONAL PROJECT EXPERIENCE

CEQA Compliance

- City of Los Angeles – Belmont Village Senior Living Westwood II Project and Sustainable Communities Environmental Assessment, City of Los Angeles
- City of Los Angeles – Central City and Central City North Community Plan Update EIR, City of Los Angeles
- City of Los Angeles – Los Angeles Metro Union Station to Cerritos Line EIR, City of Los Angeles
- City of Long Beach– 3655 North Norwalk Boulevard Residential Development EIR, City of Long Beach
- City of Long Beach– Staybridge Suites Hotel and Rezone IS-MND, City of Long Beach

  City of Beverly Hills – 100 North Crescent Street Media Center Project EIR, City of Beverly Hills
- City of Burbank – Select by Laterra Mixed-Use Project EIR, City of Burbank
- Role, City of West Hollywood – 8816 Beverly Boulevard West Hollywood Cancer Center Project EIR, City of West Hollywood

EDUCATION

BA, Environmental Studies, University of California, Santa Barbara

Shannon McAlpine

Environmental Planner I

Ms. McAlpine is an emerging environmental planner that has over one year of experience and is responsible for preparing various environmental and planning documents. Her responsibilities include preparing CEQA and NEPA environmental assessments, CEQA review and application processing, and conducting noise-monitoring. Her experience includes assisting with the management of the Southern California Association of Government's Intergovernmental Review database per CEQA and tracking and compiling federal, state, and regional air quality and conformity related regulations, policy guidance, programs, and studies.

SELECT PROJECT EXPERIENCE

Planner, City of Carmel by the Sea – Garbage Ordinance Update, Carmel by the Sea
Ms. McAlpine is assisting with the preparation of the Garbage Ordinance Update for the City of Carmel by the Sea. The City had not updated their Garbage Ordinance in over five years and sought Rincon's assistance. Her responsibilities include revising the existing ordinance to incorporate new solid waste requirements, including SB 1383, in order to comply with new state law.

CEQA/Air Quality Analyst, City of Los Angeles – 150 Judge John Aiso Street CE Project, Los Angeles
Ms. McAlpine served as a CEQA and technical analyst in assisting the City of Los Angeles with a Class 32 CE, which involved a mixed-use infill project that included 248 affordable apartment units, commercial/retail spaces, on-site social services, and a philanthropic institution space. Her responsibilities included drafting the environmental document and air quality study, including air quality emissions modeling.

Planner, City of Concord – Contract Planning, Various Wireless Communication Facility Projects, Concord
Ms. McAlpine assists with the review and application processing of various wireless communication facility projects within the City of Concord. Her responsibilities include reviewing project documents for completeness and compliance with City regulations, evaluation of radio frequency exposure, and drafting the findings, facility notice, and complete letter for each project.

CEQA/Air Quality Analyst, Green Dot Public Schools California – Green Dot Animo Compton Project, Los Angeles County
Ms. McAlpine served as a CEQA and technical analyst in assisting Green Dot Public Schools California with their project's initial application package to the County of Los Angeles. The project involved the development of a public charter school for grades 6 through 12, including the repurposing of an existing building and construction of a new two-story classroom building consisting of 26 classrooms and four laboratories. Her responsibilities included drafting the required County environmental assessment information form and air quality and greenhouse gas study, which included both air quality and greenhouse gas emissions modeling.

Planner, County of Monterey – Contract Planning, Various Cannabis Use Projects, Monterey County
Ms. McAlpine assists with the review and application processing of various cannabis projects within the County of Monterey. Her responsibilities include reviewing project documents for completeness and compliance with CEQA and County regulations, close coordination with County staff and project applicants, and preparing staff reports for public hearings.

CEQA Analyst, City of West Hollywood– West Hollywood Housing Element Update EIR, West Hollywood
Ms. McAlpine is assisting the City of West Hollywood with an EIR for their 6th Cycle Housing Element. Her responsibilities include drafting various sections for the document, including Hazards and Hazardous Materials and Utilities and Service Systems.

ADDITIONAL PROJECT EXPERIENCE

CEQA Compliance

CEQA Analyst, Various Clients – CEQA Compliance Projects, Various Counties/Cities, California

- CEQA Analyst, City of Walnut– Walnut Housing Element Update Addendum to the City of Walnut's 2018 General Plan EIR, Walnut
- CEQA Analyst, City of Pomona – 3101 West Temple Avenue Hotel Expansion Project Initial Study-Mitigated Negative Declaration, Pomona
- CEQA Analyst, Las Virgenes-Triunfo Joint Powers Authority – Tapia Water Reclamation Facility 003 Outfall Rehabilitation Project, Los Angeles County
- CEQA Analyst, City of Pomona – 528 East Grove Street Project Exemption Checklist Pursuant to CEQA Guidelines 15183, Pomona
- CEQA Analyst, City of Fontana – Ventana at Duncan Canyon Specific Plan Amendment Initial Study, Fontana
- CEQA Analyst, AMCAL Multi-Housing, Inc. – Clover Apartments Addendum to Hampton Station Project Initial Study-Mitigated Negative Declaration, Sacramento
- CEQA Analyst, Kern County Planning and Natural Resources Department – Malibu Vineyards Industrial Parkway Project Initial Study Checklist, Kern County
- CEQA Analyst, Discount Caregivers DBA DC Collective – Discount Caregivers DBA DC Collective Cannabis Microbusiness Licensing Application CE, Los Angeles

NEPA Compliance

NEPA Analyst, Various Clients – NEPA Compliance Projects, Various Counties/Cities, California

- NEPA Analyst, Los Angeles County Development Authority – Essex Tower Project EA, Lancaster
- NEPA Analyst, City of Santa Ana – Santa Anita Park Improvements Phase II, Santa Ana
- NEPA Analyst, Los Angeles County Development Authority – Nadeau Affordable Housing Project EA, Los Angeles County
- NEPA Analyst, City of Santa Ana – Heninger Neighborhood Residential Street Improvements Project CEST, Santa Ana

EDUCATION

BA, Urban Studies & Community Development, Boise State University

CERTIFICATIONS/ REGISTRATIONS

Certification, Dispute Resolution & Conflict Management

Certification, Civil Mediation

Jenna Shaw

Environmental Planner

Ms. Shaw provides long-range, contract, and environmental planning support as a Planner within Rincon's Environmental Planning and Sustainability team. Ms. Shaw has experience in land use planning, and has assisted with the preparation of General Plans, Zoning Ordinances, and CEQA-related documents. Outside of land use planning, Ms. Shaw has experience with sustainability-related documents such as Climate Action Plans and Mitigation Plans related to sea level rise and costal inundation. Additionally, Ms. Shaw has experience in public outreach, and is certified in conflict management and civil mediation, providing expertise in navigating difficult conversations and controversial decisions. She has written several high-level academic works on various issues such as sea level rise and vulnerability, coastal adaptation strategies, development on agricultural land, housing policies, and more.

SELECT PROJECT EXPERIENCE

Environmental Planner, City of Palo Alto – 6th Cycle Housing Element Update, Palo Alto
Rincon is assisting the City of Palo Alto in the preparation of their Housing Element Update, including subsequent amendments to the Comprehensive Plan and Zoning Ordinance. Ms. Shaw assists with correspondence, manages working group materials, and provides status updates to the City and the public.

Assistant Project Manager, City of Carlsbad – 6th Cycle Housing Element Update and General Plan Maintenance, Carlsbad
Ms. Shaw is assisting in the management of the City of Carlsbad Housing Element Update. This update also includes General Plan maintenance and CEQA support. Ms. Shaw helped coordinate directly with the client regarding scheduling and deliverables. Additionally, Ms. Shaw assisted with the facilitation of Housing Element Advisory Committee meetings including stepping in as the Minutes Clerk and preparing all relevant meeting materials such as agendas and staff reports.

Environmental Planner, City of Vista – Housing Element Update, Vista
Ms. Shaw is assisting with the preparation of the 6th Cycle Housing Element for the City of Vista. She has assisted with the development of a virtual public engagement program that respects COVID-19 restrictions and meets HCD requirements for public outreach. Ms. Shaw also performed demographic research and analysis for the project, which ultimately informed the site selection process.

Analyst/Writer, City of Ventura – General Plan Update Background Report, Ventura
Ms. Shaw assisted with the City of Ventura General Plan Update Background Report. The City is currently in the process of updating their General Plan and is undergoing a preliminary background report. Ms. Shaw analyzed and wrote both the Biological Resources and Natural Resources sections of the report. Ms. Shaw helped to identify the current conditions of biological and natural resources in the City as well as identify potential opportunities for growth within the City.

Analyst/Writer, City of Bakersfield – General Plan Recommendations Report, Bakersfield
Ms. Shaw assisted with preparation of the General Plan Recommendations Report recently approved by the Bakersfield City Council. The City has not updated their General Plan in over 15 years and sought Rincon's assistance with the development

of a plan for the update. Ms. Shaw researched relevant legislation and developed a draft scope of work for the future project.

Analyst/Writer, City of Menifee – Contract Planning Services, Menifee
Ms. Shaw has helped write numerous CEQA documents including several Initial Study-Mitigated Negative Declaration's for the City of Menifee. Ms. Shaw has also performed plan check services and has prepared staff reports and documentation for various entitlement and development projects within the City.

Environmental Planner, City of Corona – 6th Cycle Housing Element Update, Corona
Ms. Shaw served as a Planner the Corona Housing Element Update. Ms. Shaw was heavily involved in preparation of the Housing Element itself including researching and writing extensive analysis on housing constraints present in the City. Ms. Shaw crosschecked new housing legislation and requirements with the City's Municipal Code and identified areas of Municipal Code that are out of compliance with new state law. Additionally, Ms. Shaw led the effort on the City's programs and policies, updating and crafting the City's new Housing Plan.

Environmental Planner, City of Banning – Housing Element Update, Banning
Ms. Shaw served as a Planner the Banning Housing Element Update. Ms. Shaw was heavily involved in preparation of the Housing Element including writing extensive analysis on housing constraints present in the City. Ms. Shaw crosschecked new housing legislation and requirements with the City's Municipal Code and identified areas of Municipal Code that are out of compliance with new state law. Additionally, Ms. Shaw led the effort on the City's programs and policies, updating and crafting the City's new Housing Plan.

Analyst/Writer, City of Menifee – Contract Planning Services, Menifee
Ms. Shaw has helped write numerous CEQA documents including several Initial Study-Mitigated Negative Declaration's for the City of Menifee. Contract Planning Services with the City produces ongoing projects that Ms. Shaw helps to assist with. Additionally, Ms. Shaw has helped assist with various entitlement and consistency projects for the City.

SELECT SUSTAINABILITY & POLICY WORK EXPERIENCE

Upper-Division Independent Research Project, Boise State University, "Sea Level Rise & Adaptation Strategies For Coastal Communities", Boise, Idaho (Fall 2018)
Ms. Shaw spent her Fall semester of her Senior Year conducting research on the impacts of sea level rise in coastal communities. She specifically analyzed the environmental, economic, political and social threats that sea level poses to coastal cities. Additionally, she conducted research on various adaptation strategies that coastal cities can implement. In her white paper she advocates for cities to implement not one but multiple adaptation strategies, while also looking at various methodologies cities use to determine which adaptation strategies are best to implement. Over the course of six months, Ms. Shaw became very familiar with the issue of vulnerability, specifically in relation to sea level rise and the importance for coastal communities to start implementing climate action plans.

Upper-Division Independent Research Project, Boise State University, "Infrastructure Development On Agricultural Land In Idaho", Boise, Idaho (Fall 2018)
Ms. Shaw spent a large portion of her Fall semester of her Senior Year conducting research on the social, environmental and economic ramifications of development on agricultural land in Idaho. The state of Idaho's economy and environment is highly dependent on agriculture. Idaho has of roughly 12 million acres of farmland that provide important benefits beyond the commodities that it produces. Over the course of Ms. Shaw's research, she realized the importance of advocating policy that protects farmland in order to ensure the safety of people's livelihoods, protect wildlife species, maintain a sustainable food supply and nourish an overall healthy environment.

EDUCATION

BA, Geosciences, Hamilton College, Clinton, New York

PERMITS

Field Director, California Bureau of Land Management Statewide FLPMA Permit (CA- 19-02P) (2019-2021)

Jorge L. Mendieta

ASSOCIATE PALEONTOLOGIST/FIELD DIRECTOR

Mr. Mendieta has five years of experience as a consulting paleontologist and comes from a background in geology and sedimentology. He received his bachelor's degree in geosciences from Hamilton College, Clinton, New York. During his tenure as an undergraduate, Mr. Mendieta served as a teaching assistant in geology courses and gained extensive lab experience identifying and cataloging invertebrate fossils. As Associate Paleontologist at Rincon, Mr. Mendieta has led numerous field surveys and has served as Lead Monitor or Field Supervisor in support of several construction monitoring projects for land development, water, and generation agencies in California. He has experience working on public lands in the Mojave and Colorado Deserts, including on land managed by the Bureau of Land Management (BLM), National Park Service (NPS), and the California Department of Parks and Recreation (DPR). In the field, he has served variously as paleontological monitor, paleontological surveyor, and field director for projects ranging from small residential developments to large multi-year solar developments and has provided fossil identification, bulk sediment sampling, stratigraphic analysis, geological data collection, and resource training for construction workers. In addition, Mr. Mendieta has experience preparing environmental documents, including survey reports, monitoring reports, and CEQA/NEPA documents. Mr. Mendieta is fluent in Spanish.

SELECT PROJECT EXPERIENCE

Assistant Project Manager/Staff Paleontologist, Casitas Municipal Water District – West Ojai Avenue Pipeline Replacement Project, Ojai
Mr. Mendieta is currently serving as assistant project manager for the West Ojai Avenue Pipeline Replacement Project, which includes aiding the Project Manager and project team with maintaining the project schedule, coordination, and communication. Mr. Mendieta was responsible for leading monitoring efforts during trenching and potholing investigations to identify locations of existing underground service lines. He was responsible for scheduling monitors and performed monitoring that included visually inspecting trenches, vault sites, and spoils for the presence of fossil remains. The West Ojai Pipeline Replacement Project involves the replacement of segments of pipeline which are undersized and approaching the end of their service life.

Assistant Project Manager/Staff Paleontologist, Casitas Municipal Water District – Grand Avenue Pipeline Replacement Project, Ojai
Mr. Mendieta is currently serving as assistant project manager for the Grand Avenue Pipeline Replacement Project, which includes aiding the Project Manager and project team with maintaining the project schedule, coordination, and communication. Mr. Mendieta was responsible for leading monitoring efforts during trenching and potholing investigations to identify locations of existing underground service lines. He was responsible for scheduling monitors and performed monitoring that included visually inspecting trenches, vault sites, and spoils for the presence of fossil remains. The Grand Pipeline Replacement Project involves the replacement of segments of pipeline which are undersized and approaching the end of their service life.

Staff Paleontologist, Metropolitan Water District of Southern California (subconsultant to HELIX Environmental Planning, Inc.) – Prestressed Concrete Cylinder Pipe Rehabilitation Program, Los Angeles, Orange, and San Bernardino Counties
Mr. Mendieta prepared several paleontological resources technical studies and mitigation plans for rehabilitation projects along more than 100 miles of five prestressed concrete cylinder pipelines extending through over 30 jurisdictions in Los Angeles, Orange, and San Bernardino Counties in both dense urban and remote rural regions.

Staff Paleontologist, Eastern Municipal Water District (subconsultant to Woodard & Curran) – Cactus Avenue Corridor Project, Moreno Valley, Riverside County
Mr. Mendieta prepared the paleontological resources technical study used to inform the Initial Study/Mitigated Negative Declaration for the Cactus Avenue Corridor Project. The project involves the development and operation of groundwater extraction, treatment, and distribution facilities in the Perris North Groundwater Management Zone. The project includes construction and operation of extraction wells, raw water and treated water pipelines, and a water treatment and blending plant.

Staff Paleontologist, City of Bell Gardens – John Anson Ford Park Infiltration Cistern Project to Capture Urban Runoff, Bell Gardens
Mr. Mendieta prepared the paleontological resources technical study used to inform the Initial Study/Mitigated Negative Declaration for the John Anson Ford Park Infiltration Cistern Project to Capture Urban Runoff. The project involves installing a stormwater capture and subsurface infiltration system at John Anson Ford Park Infiltration Cistern Project to capture, retain, infiltrate, and replenish urban runoff.

Staff Paleontologist, County of Monterey – Fort Ord Regional Trail and Greenway Project Transportation Agency for Monterey County, Monterey County
Mr. Mendieta prepared several paleontological resources technical studies, in accordance with the requirements of the CEQA and NEPA, for the Fort Ord Regional Trail and Greenway Project. The project involves developing various multi-use trail segments within the cities of Marina, Seaside, Del Rey Oaks, Monterey, unincorporated areas of Monterey County, and lands, properties, and rights-of-way under the jurisdiction of California State University, Monterey Bay, Fort Ord Reuse Authority, California Department of Transportation, and Monterey Peninsula Regional Park District. The trail connects with the existing Monterey Bay Coastal Recreation Trail just west of State Route 1 and would extend through developed areas and across former Fort Ord lands to the east.

Staff Paleontologist, 8minute Energy – Bellefield Solar Farm Project, Kern County
Mr. Mendieta prepared the paleontological resources technical study used to support Conditional Use Permit applications for the Bellefield Solar Farm Project. The project involves a large solar farm over several hundred acres in the deserts of Kern County. Tasks included determining the paleontological sensitivity of geologic units within the project sites, assessing potential for impacts to paleontological resources from development of the proposed projects, and recommending mitigation measures to avoid or mitigate impacts to scientifically significant paleontological resources.

Staff Paleontologist, 8minute Energy – Aratina Solar Farm Project, Kern County
Mr. Mendieta prepared the paleontological resources technical study used to support Conditional Use Permit applications for the Aratina Solar Farm Project. The project involves a large solar farm over several hundred acres in the deserts of Kern County. Tasks included determining the paleontological sensitivity of geologic units within the project sites, assessing potential for impacts to paleontological resources from development of the proposed projects, and recommending mitigation measures to avoid or mitigate impacts to scientifically significant paleontological resources.

Paleontological Monitor, Myers and Sons Construction - Malibu Wastewater Treatment Facility, City of Malibu, Los Angeles County
Responsible for paleontological construction monitoring, fossil identification, stratigraphic analysis, and geologic data collection.

James Williams

Architectural Historian

Mr. Williams has five years of professional experience and meets the SOI PQS for Architectural History and History. His professional experience includes the preparation of historic resource assessments in support of NEPA, Section 106 of the NHPA, CEQA, and local historic preservation regulations. He has conducted historic surveys and archival research, carried out Native American and local interested party consultation, and recorded and evaluated historic properties on DPR 523 series forms. He has also assisted in the preparation of several HAER-like documentation packages as part of mitigation measures on behalf of various municipal agencies.

EDUCATION

MA, Public History, California State University, Sacramento

BA, History, California State University, Sacramento

SELECT PROJECT EXPERIENCE

Architectural Historian, Los Angeles County Metropolitan Transit Authority – Metro Los Angeles West Santa Ana Branch Existing Conditions Report & Survey, Los Angeles County
Mr. Williams served as an architectural historian in support of a light rail transit project in Los Angeles County. Under NEPA, CEQA, and Section 106, his efforts included historical background research regarding several communities located in the project area, field recordation of historic-age buildings, and the evaluation of built environment resources on DPR 523 forms. He also contributed to the project's Existing Conditions report.

Architectural Historian, City of Berkeley – 2012 Berkeley Way Mixed-Use Project, Historic Properties Assessment and Finding of No Adverse Effect, Berkeley
Mr. Williams served as principal author for cultural resources evaluation report completed in support of NEPA compliance efforts for a proposed housing and commercial development project. Under Section 106, his contributions included the completion of a historic built-environment survey and the recordation and evaluation of historic properties on DPR 523 forms. He also contributed to an assessment of project's effects on adjacent NRHP-listed and potentially eligible historic properties.

Architectural Historian, City of Ventura – Historical Resources Assessment, 1691 East Main Street, City and County of Ventura
Mr. Williams served as an architectural historian for this historic resources assessment completed in support of a proposed residential development in Ventura. Mr. Williams served as lead author of the historic resources technical memo, conducted archival research, and recorded and evaluated the property for federal, state, and local eligibility on DPR 523 forms.

Architectural Historian, ELS Architecture + Urban Design – Historic Resources Evaluation, Frances Willard Park, Berkeley
Mr. Williams served as an architectural historian for this Historic Resources Evaluation Report completed in support of CEQA documentation for the proposed remodeling of a public park clubhouse. Mr. Williams was a contributing author of the report, conducted archival research, and recorded and evaluated the property for federal, state, and local eligibility on DPR 523 forms.

Architectural Historian, QK, Inc. – Cultural Resources Assessment Report for Creekside Development Project Tract No. 6164, Clovis
Mr. Williams served as an architectural historian for this cultural resources assessment completed in support of Section 106 compliance for a residential development in Clovis, California. Mr. Williams served as lead author of the report, conducted archival research, conducted Native American and interested party outreach, and recorded and evaluated the property for federal, state, and local eligibility on DPR 523 forms.

Architectural Historian, 3636 Linden Holding, LLC – Focused Historic Resources Evaluation and Character-Defining Features Memo, 3636 Linden Avenue, Long Beach
Mr. Williams served as an architectural historian on this historic resources evaluation of the Petroleum Club of Long Beach. His efforts included historical background research pertaining to the property, the identification of interior and exterior character-defining features, and the evaluation of resources in a historic resources evaluation and character-defining features memo.

Architectural Historian, City of Santa Ana, Planning and Building Agency – Cultural Resources Study for the First American Mixed Use Project, Santa Ana, Orange County
Mr. Williams served as an architectural historian on this cultural resources study of mixed-use redevelopment project located adjacent to the NRHP-listed Downtown Santa Ana Historic District. In support of CEQA compliance, his efforts included archival background research, field recordation, and evaluation of built environment resources on DPR 523 forms. He also assessed under CEQA guidelines the proposed redevelopment project's potential to affect the neighboring district.

Architectural Historian, City of Concord – Cultural Resources Assessment, Community Services Exemption Report, Grant Street Mixed-Use Project, Concord
Mr. Williams served as an architectural historian for this proposed mixed-use development project in downtown Concord, California. In support of CEQA compliance, was a contributing author to the cultural resources technical report and evaluated historic properties under CEQA and local regulations.

Architectural Historian, California Department of Transportation – Environmental Impact Report/Environmental Impact Statement for North County Corridor Project, Stanislaus County
Mr. Williams served as an architectural historian on in support of NEPA, Section 106, and CEQA compliance for a highway widening project in rural Stanislaus County. His chief contribution was the recordation and evaluation on DRP 523 forms of architectural and infrastructural resources per Section 106 and CEQA. In addition, Mr. Williams worked among a small team of historians tasked with gathering and interpreting an extensive array of archival and published sources related to the cultural and economic development of the subject region.

ADDITIONAL PROJECT EXPERIENCE

Architectural Historian, Various Clients – Cultural Resource Inventories and Evaluations Projects, Various Counties/Cities

- City of Concord – Cultural Resources Technical Report, Community Services Exemption Report, Grant Street Mixed-Use Project, Concord
- Antelope Valley Community College District – Environmental Impact Report, Antelope Valley Community College District 2016 Facilities Master Plan, Lancaster
- California Department of Transportation – Environmental Impact Report/Environmental Impact Statement for North County Corridor Project, Stanislaus County
- City of Sacramento - Sacramento Register of Historic and Cultural Resources District Nomination for Old Sacramento Historic District and State Historic Park, Sacramento
- California Department of Water Resources - Environmental Impact Report/Environmental Impact Statement, Bay-Delta Conservation Project (BDCP), Sacramento-San Joaquin River Delta

FEHR PEERS

John Muggridge, AICP

Principal

EDUCATION

Master of Science, Transportation Planning and Engineering, University of Leeds

Bachelor of Engineering, Mechanical and Process Engineering, University of Sheffield

REGISTRATIONS

American Institute of Certified Planners (021879)

AFFILIATIONS

American Planning Association (APA)

EXPERTISE

- Long-range Multimodal Transportation Planning
- Multimodal Corridor Planning
- Transportation Demand Management
- Travel Demand Modeling
- Land Use and Transportation
- Traffic Analysis

ABOUT

John has over 20 years of experience in transportation planning and engineering, both in England and in the United States. As a transport planner, John has research and analysis experience in both the private and academic sectors. John is knowledgeable in multi-disciplinary transportation and research projects, including multi-modal transportation planning projects and travel demand forecasting. He has authored numerous reports, managed and participated in a large range of transportation planning, traffic engineering, and parking studies for both private and public clients in Southern California and Hawaii. He also has extensive experience in conducting parking and circulation studies, traffic impact studies, downtown parking studies, long-range transportation plans, corridor studies and specific plans. John has worked with interdisciplinary teams to develop consensus on a wide range of transportation improvements.

SELECTED PROJECT EXPERIENCE

Downtown Mobility Investment Plan (Los Angeles, CA)

Fehr & Peers is leading a team to support the City in developing the DTLA Mobility Investment Plan (MIP), a project that is reliant on technical objectivity for Downtown Los Angeles that is built upon stakeholder interests and acceptance. It is particularly dependent on addressing the community's mobility needs through engagement designed to obtain input from many diverse segments of the community. For this effort, Fehr & Peers is mapping stakeholders and community groups, developing engagement strategies, and using survey mechanisms to lead towards a list of transportation improvement projects to better connect the Downtown LA communities. Our keen understanding of the Downtown landscape combined with proven community engagement efforts and deep knowledge of local mobility issues will result in a project the City of Los Angeles can be proud of. John is serving as Principal-in-Charge.

Downtown Community Plan (Los Angeles, CA)
Fehr & Peers is currently working on the Central City Community Plan Update for the City of Los Angeles. This community plan was initiated as part of an ongoing process to update all 35 community plans in the city by 2024, and serves as an example to future community plan updates in both analysis format and integration of latest city initiatives. Fehr & Peers is leading the transportation element of the plan, using the travel demand forecasting (TDF) model our team built for the City to regional and local specifications to analyze the changes estimated to take place with the adoption of the plan, including network, socio-economic, and zoning updates. John is serving as Principal-in-Charge

Transportation Analysis and Nexus Study for Hollywood Community Plan Update
Fehr & Peers is conducting a transportation analysis and nexus study for the Hollywood Community Plan Update for the City of Los Angeles. This includes an existing conditions analysis and evaluating future conditions using the City's travel demand model, which Fehr & Peers developed. Then the future Community Plan scenarios are being analyzed with possible transportation network improvements. Transportation mitigation measures could include the City's 2035 Mobility Plan, also prepared by Fehr & Peers, and tailored refinements for the Hollywood community. Fehr & Peers is responsible for the preparation of the Transportation section of the EIR. The Nexus Study evaluates impact assessment for determination of new developments' fair share contributions to transportation improvements based on VMT and VMT per capita. John advised on the model development.

Burbank Impact Fee Study
Fehr & Peers, as part of a team, is preparing an updated impact fee study for the City of Burbank. In a shift from the existing fee program, the updated transportation section will focus on multi-modal improvement projects instead of auto-oriented infrastructure projects. This process including reviewing the projects on the City's existing Infrastructure Blueprint and assisting the project team with the identification of new transportation projects for the updated fee program. Fehr & Peers is conducting a nexus analysis to relate the needs for the identified transportation improvements to new development in the study area. The fee study establishes a reasonable relationship between new development, the proportion of expected vehicle trips, and congestion levels attributable to new development, and the necessary roadway, sidewalk, bike lane or other transportation improvements that will be funded by the development impact fee program. The City of Burbank's Travel Demand Model, which Fehr & Peers developed, will be used to ascertain the portion of traffic/VMT that is attributed to new trips generated by new development in the City. John is Principal-in-Charge.

Expo Corridor Transit Neighborhood Plans
Fehr & Peers served the City of LA in their "Transit Neighborhood Planning" for 10 future light rail stations along the Crenshaw and Expo lines. The project included new land use and streetscape regulations, general plan amendments, and specific plans for five of the stations. Our approach to trip generation, parking demand estimation, and transportation evaluation was informed by the City's new and innovative approaches to transportation evaluation contained in the LA2B update to the circulation element. Fehr & Peers' combination of experience with market based private development impact analysis and our citywide efforts on the Mobility Element came together to meet the City's desire to incentivize an appropriate mix and density of land uses, foster economic development, improve ridership, provide and maintain affordable housing, and enhance the quality of the built environment.

Infill and Complete Streets - Capturing VMT Impacts and Benefits to CEQA, City of Los Angeles, CA
The City of Los Angeles is shifting from an auto-oriented metropolis to a city built around transit, compact transit-oriented development, and multi-modal "Complete Streets" which emphasize all travel modes. However, these dynamic policy shifts have been significantly impeded by requirements under CEQA to mitigate automobile delay. The City wants to seize the historic opportunity, mandated by SB 743, to realign the environmental review processes with policies that support infill development and Complete Streets transportation projects. Fehr & Peers was selected to work closely with the LADCP and LADOT to develop new VMT-based CEQA thresholds and to update the tools necessary to implement the new procedures. In addition to developing the new thresholds, Fehr & Peers is updating the City's travel demand model, which John oversaw, along with developing a sketch model tool to perform project-level VMT analysis; quantifying the parking demand and vehicle trip reduction benefits for mixed-use projects, creative office buildings, market rate housing, and affordable housing, and Transportation Demand Management (TDM) strategies. The affordable housing sites are broken down based on population and location. Fehr & Peers is educating city staff, private developers, and the community about the new impact review methodology through an engaging public outreach program.

FEHR PEERS

Amanda Chapman, AICP

Project Manager

EDUCATION

Master of Urban Planning
Physical Planning + Urban Design
University of Michigan, Ann Arbor, MI, 2011

Bachelor of Arts, Urban Studies and Planning
University of California, San Diego, 2009

REGISTRATIONS

American Institute of Certified Planners (AICP)

AFFILIATIONS

American Planning Association (APA)
Urban Land Institute

ABOUT

Amanda Chapman is planner and project manager specializing in multi-modal transportation and visual communication in the Los Angeles office of Fehr & Peers. She is also the Operations Manager for the Los Angeles office. With experience working in government, non-profit, and private sectors, Amanda is passionate about developing plans and communication tools that embody a strong sense of place and reflect the unique needs of a community. She has experience in streetscape and smart growth projects, branding and logo design, multi-modal safety, community engagement, and mobility elements in environmental documentation. Her efforts in streamlining visual communication and cartography tools have resulted in final reports and outreach materials that are easily understood by any audience. Amanda graduated from UC San Diego with a BA in Urban Studies and Planning in 2009, and the University of Michigan Taubman College of Architecture and Urban Planning with a Masters in Urban and Regional Planning in 2011. She is proficient in the Adobe Creative Suite, Google SketchUp, Microsoft Office, and ESRI ArcGIS.

PROJECT EXPERIENCE

DTLA Mobility Investment Plan (Los Angeles, CA)
Fehr & Peers is leading a team to support the City in developing the DTLA Mobility Investment Plan (MIP), a project that is reliant on technical objectivity for Downtown Los Angeles that is built upon stakeholder interests and acceptance. It is particularly dependent on addressing the community's mobility needs through engagement designed to obtain input from many diverse segments of the community. Amanda is serving as project manager on this project, leading community engagement, data analysis, strategic decision-making, and final deliverable process.

Downtown Community Plan (Los Angeles, CA)
Fehr & Peers is currently working on the Central City Community Plan Update for the City of Los Angeles. This community plan was initiated as part of an ongoing process to update all 35 community plans in the city by 2024, and serves as an example to future community plan updates in both analysis format and integration of latest city initiatives. Fehr & Peers is leading the transportation element of the plan, using the travel demand forecasting (TDF) model our team built for the City to regional and local specifications to analyze the changes estimated to take place with the adoption of the plan, including network, socio-economic, and zoning updates.

Amanda Chapman is serving as Project Manager for the Central City Community Plan Update, working closely with multiple City departments, the greater project team, and the team working on the adjacent and simultaneous Boyle Heights Community Plan Update. She oversees model preparation inputs and analysis, coordinates project meetings and decision-making, and uses her graphic design expertise on all project final materials.

Pershing Square Site Access (Los Angeles, CA)
Fehr & Peers was part of the winning team to redesign and update Downtown LA's historic Pershing Square. As part of an effort to increase connectivity between Pershing Square and the surrounding neighborhood, Fehr & Peers analyzed several new pedestrian and vehicle access designs. The study included creation of a microsimulation model to test changes in signal timing, lane configuration, and driveway location. We also provided insight for the team on mobility issues with the site design, and developed solutions for the site with the goal of balancing vehicle congestion with increased pedestrian space and priority. Amanda served as project manager and graphic designer on this project.

Metro Quality of Life Study (Los Angeles, CA)
Fehr & Peers led the preparation of the Quality of Life study for Metro. The study took a deep dive into data on Metro performance to evaluate the benefits to Los Angeles County quality of life driven by Metro's investments from 2008, when Measure R was passed, until 2015.

The Fehr & Peers team created a new communications tool with which Metro can tell the story of positive change in the region over time, as well as identify and acknowledge those area which need additional improvement. Amanda served as a project planner and analyst, and led the graphic design efforts throughout the project, including the entire report layout and design, and the creation of over 100 unique data-based user-friendly graphics.

Active Transportation Strategic Plan (Los Angeles, CA)
Fehr & Peers prepared the Active Transportation Strategic Plan for Metro, which was used to build support and set funding levels for active transportation projects in LA's successful sales tax initiative for transportation (Measure M). The team's outreach efforts included a Technical Advisory Committee; public meetings with local stakeholders; and meetings with Councils of Governments throughout Los Angeles County. As part of the Active Transportation Strategic Plan, Fehr & Peers worked with Metro to develop first-/last-mile treatments that improve safety for pedestrians and bicyclists accessing transit. This process included extensive data assembly from multiple stakeholders, data analysis, and the creation of visual displays to communicate a complete picture of transportation issues at each station site. Amanda created the project design and executed the report layout and materials.

Great Streets Corridors Benchmarking(Los Angeles, CA)
Los Angeles Mayor Eric Garcetti has pursued a back-to-basics agenda as the keystone of his mayorship. The premise is that a capable, transparent government with exceptional customer service will best position Los Angeles as a prosperous, sustainable, and equitable city for generations to come. At the epicenter of this vision is the Mayor's Executive Directive No. 1 (ED1), which established the Great Streets Initiative. Our team evaluated all 15 Great Streets corridors. For each, we explored a host of metrics related to public life and the goals of ED1. We assessed each corridor before and after project implementation to shed light on how the Great Streets interventions have influenced their surroundings. We also researched areas not slated to receive Great Streets enhancements. This establishes a baseline against which to compare the Great Streets corridors. Amanda served as planning analyst and graphic designer on this project.

Bike Share Expansion Feasibility (Los Angeles, CA)
Fehr & Peers is working with LA Metro to evaluate expansion options and conduct bike share station siting throughout Los Angeles County, coordinating expansion plans and station siting activities with local cities in Los Angeles County. This has included developing feasibility studies, ridership forecasts, financial plans, and station siting matrices for each City. Fehr & Peers has used publicly available data to map existing bike share origin/destination data and a bike share suitability index map that can help Metro and other cities plan for a variety of bike share investment scenarios. Station siting activities help cities understand considerations such as available right-of-way, station spacing, power sources, and station capacity. Amanda is the lead designer for all graphics and creative memos for the project, as well as a project planner and web-map developer.

Sepulveda Pass Transit Corridor (Los Angeles County)
Fehr & Peers is part of the team working on the Sepulveda Transit Corridor Project, which aims to connect the San Fernando Valley, the Westside and LAX through high-capacity transit along the Sepulveda Pass and I-405 corridor. Fehr & Peers analyzed demographic, land use, and mobility performance data to assist in the definition of the study area which would be used to evaluate the project. We also researched and documented current travel patterns and characteristics for the study area, for which Fehr & Peers developed a travel markets analysis utilizing transit capacity, estimated future travel patterns, and GPS-enabled origin/destination data. We developed GIS and Illustrator base maps for the project deliverables and created over 50 maps and graphics representing the complex data analyzed.

5 MITIGATION MONITORING PROGRAM

Public Resources Code (PRC) Section 21081.6 and California Environmental Quality Act (CEQA) Guidelines Section 15097 require adoption of a Mitigation Monitoring Program (MMP) for all projects for which an Environmental Impact Report (EIR) has been prepared. Specifically, PRC Section 21081.6 states:

> "…the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment…[and that the program] …shall be designed to ensure compliance during project implementation."

CEQA Guidelines Section 15097 provides guidelines for implementing monitoring and reporting programs. Specific monitoring requirements to be enforced during project implementation must be defined prior to final approval of a project by the decision-maker. Although the Lead Agency (the City of Los Angeles) may delegate monitoring responsibilities to other agencies or entities, the Lead Agency "…remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

The MMP describes the procedures for the implementation of the mitigation measures adopted for the Proposed Project. The MMP for the Proposed Project will be in place through the planning horizon of the Housing Element Update (2029), or until the element and EIR are updated again, whichever is later, or for individual development projects for which the mitigation measures have been imposed, the MMP is effective until the mitigation measures have been satisfied or deleted/modified pursuant to this MMP. The City of Los Angeles Department of City Planning (DCP) staff and staff of other City Departments (e.g., Department of Building and Safety) are responsible for administering the MMP activities, or delegating them to consultants or contractors. The Monitoring or Enforcing Agencies identified herein, at their discretion, may require a project applicant or operator to pay for one or more independent professional(s), with any necessary training and qualifications, to be responsible for preparing, reviewing, or certifying any required report, study, analysis, or certification, or monitoring implementation of mitigation measures (e.g., City building inspector, project contractor, certified professionals, etc., depending on the requirements of the mitigation measures) required of project applicants or operators. Monitors would be hired by the City or by the applicant or operator at the City's discretion.

Each mitigation measure is identified in Table 5-1 and is categorized by environmental topic and corresponding number, with identification of:

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

All the identified mitigation measures are to be implemented through the City's imposition of conditions of approval on future discretionary projects. These mitigation measures shall be imposed as a condition of approval subject to the City's authority to condition the applicable entitlement for any subsequent environmental review pursuant to CEQA Guidelines Sections 15162, 15163, 15164, or 15168, or tiered clearance to the Housing Element 2021-2029 and Safety Element Updates EIR, pursuant to the procedures in CEQA Guidelines Section 15152 or streamlining CEQA Clearance as permitted in PRC Sections 21083, 21094.5, 21155-21155.2, 21155.4 or CEQA Guidelines Sections 15183 or 15183.3. Nothing herein requires the mitigation measures in this MMP to be imposed on projects which are categorically or statutorily exempt from CEQA or for which an independent environmental analysis and findings were prepared in compliance with CEQA. Mitigation measures imposed as a condition of approval shall be imposed with a MMP that includes all of the following provisions:

(1) This MMP shall be enforced throughout all phases of development projects subject to the mitigation measures. The Applicant shall be responsible for implementing each mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each project design feature and mitigation measure has been implemented. The Applicant shall maintain records demonstrating compliance with each project design feature and mitigation measure. Such records shall be made available to the City upon request. Further, specifically during the construction phase (including excavation, grading and demolition) and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the mitigation measures during construction every 90 days. The documentation must be signed by the Applicant and Construction Monitor and be maintained by the Applicant. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the mitigation measures within two business

days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency. Until two years after all mitigation measures are fully satisfied, the Applicant and Owner shall maintain all records of mitigation measure compliance (e.g., reports, studies, certifications, verifications, monitoring or mitigation plans) and make available for the City's inspection within three business days of the City requesting the records. All records related to construction shall be maintained on the site during construction and shall be immediately available for inspection by the City or by the Construction Monitor. The Applicant/Owner shall also sign a Statement of Compliance, in a form approved by the City, prior to any building permit, committing to compliance with all applicable mitigation measures.

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

Table 5-1 Mitigation Monitoring Program

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
Air Quality			
4.2-2(a) Construction Emissions Reduction			
For discretionary projects that meet the following criteria, prior to project approval, the Applicant shall be required to provide to the City an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze construction emissions and identify necessary mitigation: • Demolition of more than 13,500 square feet of building area; • Greater than 5,000 cubic yards of soil cut/fill; • Greater than 5-acres of graded area; or use of more than ten pieces of heavy-duty construction equipment and 150 truck trips (or a total of 6,000 vehicle miles traveled by truck) on any given day during demolition, site clearing, or grading. The Air Quality Impact Analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are not limited to, the following mitigation: • Off-road diesel-powered construction equipment greater than 50 horsepower shall be certified for either the Tier 4 Final emission standards for CARB In-Use Off-Road Diesel-Fueled Fleets Regulations or the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of NOX and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the onsite air quality construction mitigation manager that the use of such devices is not practical for specific engine types. • All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's	Applicant for individual project	Department of City Planning (DCP), Los Angeles Department of Building and Safety (LADBS)	Prior to project approval: review and approve the Air Quality Impact Analysis; During grading, excavation, demolition and construction: monitor compliance

[1] The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
certified tier specification, BACT documentation, and ARB or SCAQMD operating permit shall be provided. • Vehicle idling shall be limited to five minutes as set forth in the California Code of Regulations, Title 13. Signs shall be posted in areas where they will be seen by vehicle operators stating idling time limits. • Heavy duty diesel-fueled equipment shall use low NOx diesel fuel to the extent that it is available and feasible to use. • Construction haul truck operators for demolition debris and import/export of soil shall use trucks that meet the California Air Resources Board's (CARB) 2010 engine emissions standards at 0.01 grams per brake horsepower-hour of PM and 0.20 grams per brake horsepower-hour of NOx emissions. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and shall make these records available for inspection upon request by the City of Los Angeles or the South Coast Air Quality Management District (SCAQMD). • Construction contractors shall utilize construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that they are available and feasible to use. • Equipment such as tower cranes and signal boards shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use for electric tools, equipment, lighting, etc. Construction equipment such as tower cranes and signal boards shall utilize electricity from power poles or alternative fuels (i.e., non-diesel), rather than diesel power generators and/or gasoline power generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible. • Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of commercial availability of such equipment will be made by the City prior to issuance of grading or building permits based on applicant provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]

obtained by the City from expert sources such as construction contractors in the region.
• Consistent with SCAQMD Rule 403, construction contractors shall identify and implement best available dust control measures during active construction operations capable of generating dust.
• Construction contractors shall maintain construction equipment in good, properly tuned operating condition, as specified by the manufacturer, to minimize exhaust emissions. Documentation demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications shall be kept on-site and made available to LADBS inspectors during inspection.
• Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.
• Construction activities shall be discontinued during second-stage smog alerts (when feasible). A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site. If infeasible to stop work, i.e., in the instance of a continuous concrete pour, construction activities shall be limited to those activities necessary to complete the immediate job.
• For projects where continuous pour activities will extend past the typical construction day:
  • Concrete trucks shall have an average capacity of 10 cubic yards to minimize the number of concrete truck trips.
  • Contractor shall use local concrete suppliers with 90 percent or more of the concrete supplied by one or more facilities within a driving distance of less than 5 miles per one-way trip or 10 miles round trip where feasible.
  • Contractor shall be required to use alternatively fueled concrete trucks that achieve the same or lower NOx emissions as CNG-fueled concrete trucks to the extent feasible. The level of feasibility/infeasibility shall be approved by the City prior to the beginning of concrete pouring activities.
• During plan check, applicant shall make available to SCAQMD a comprehensive inventory of all of road trucks and concrete trucks to be used for the project, including horsepower rating, engine production year, and certification of the specified equipment.			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
4.2-2(b) Operations Emissions Reduction			

For discretionary projects, prior to project approval, the Applicant shall be required to provide the City an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze operational emissions and identify necessary mitigation for any discretionary project that would include more than 462 single-family residential units, 612 multi-family residential units, or any equivalent combination thereof. The Air Quality Impact Analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are not limited to, the following mitigation:
• Implementation of a Transportation Demand Management Plan.
  • Installation of additional electric vehicle charging stations
  • Public infrastructure improvements (e.g., bus stop shelter improvements)
  • Carpool or ridesharing programs
  • Subsidized transit costs
  • Unbundled parking costs
  • Bicycle amenities (storage, showers, lockers, etc.)
• Use of all-electric appliances (i.e., elimination of natural gas service).
• Use solar or low emission water heaters that exceed Title 24 requirements.
• Increased walls and attic insulation beyond Title 24 requirements.
• Property management plan that obligates property manager to use of low-VOC paints and coatings, meeting SCAQMD standards, for property management and required use of electric yard and landscaping equipment, including lawnmowers, leaf-blowers, and chainsaws.
	Applicant for individual project	DCP, LADBS	Prior to project approval: review and approve the Air Quality Impact Analysis, any required TDM Plan or Property Management Plan, and condition any necessary assurances and commitments of compliance.
			Prior to building permits, ensure any necessary assurances and commitments of compliance are obtained.

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
4.2-3 Construction TAC Reduction Measures			
For discretionary projects with an anticipated construction duration of greater than 18-months and located within 500 feet of a residence or other sensitive receptor, prior to issuance of a permit to construct, the applicant shall provide to the City an Air Quality Impact Analysis, prepared by a qualified air quality analyst, that includes a construction health risk assessment. If the analysis shows incremental cancer risk would exceed 10 persons in one million at a sensitive receptor or the calculated Hazard Index for chronic or acute risks would exceed a value of 1.0 at a sensitive receptor, the air quality analyst shall prepare a mitigation plan subject to City review and approval that reduce TACs to less than SCAQMD thresholds. The applicant shall comply with all mitigation measures in the mitigation plan. Alternatively, no Air Quality Impact Analysis, health risk assessment, and mitigation plan shall be required for discretionary projects conditioned to use construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all equipment rated 50 horsepower or greater. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.	Applicant for individual project	DCP, LADBS	Prior to project approval: review and approve an Air Quality Impact Analysis with a Health Risk Assessment; or condition for applicant to provide necessary assurances to use Tier 4 equipment with necessary CARB or SCAQMD operating permit (if applicable). Prior to building permits: verify necessary assurances provided
Biological Resources			
4.3-1(a) Biological Resources Reconnaissance Survey and Reporting			
For all discretionary projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes on natural (e.g., native, virgin) or disturbed but undeveloped (e.g., unpaved, areas barren, or ruderal), areas that contain or have the potential to support special-status species, sensitive habitat, or within 300 feet of suitable habitat to support special-status species (e.g., nesting passerines) as determined by the Department of City Planning, including through consultation with CDFW, the project applicant shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of Proposed Project on wildlife corridors.	Applicant for individual project	Department of City Planning (DCP)	Prior to project approval: review and approve biological resource assessment, condition project, if necessary, regarding identified wildlife corridors Prior to building permits: ensure any identified wildlife corridors are not closed by project; During Construction/grading; monitor compliance

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to Department of City Planning (DCP) prior to project approval, and the project may proceed without any further biological investigation. If wildlife corridors are present, the report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.			
4.3-1(b) Sensitive Species/Habitat Avoidance: Pre-Construction Bird Nest Surveys, Avoidance, and Notification			
For all discretionary projects where sensitive species and/or habitat are identified in the biological resources assessment prepared pursuant to MM 4.3-1(a), the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and California Department of Fish and Wildlife (CDFW) prior to ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the	Applicant for individual project	DCP, California Department of Fish and Wildlife (CDFW)	Prior to project approval: review and approve biological resources assessment including necessary surveys and avoidance, relocation, plans, etc. Prior to issuance of grading permit; ensure plans show requirement to avoid bird nest and BMPs During construction (including excavation, grading, and demolition): monitor compliance

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
monitoring and species relocation shall be prepared and submitted to DCP and CDFW following construction. Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective measures conducted shall be prepared by a qualified biologist. Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
4.3-1(c) Focused Surveys for Rare Plants			
If indicated as appropriate by the biological resources assessment report required in Mitigation Measure 4.3-1(a), focused surveys for special status plants shall be conducted. Prior to vegetation clearing for construction in open space areas, special status plants identified in the focused surveys shall be counted and mapped and a special-status plant relocation plan shall be developed and implemented to provide for translocation of the plants. The plan shall be prepared by a qualified biologist and shall include the following components: (1) identify an area of appropriate habitat, on-site preferred; (2) depending on the species detected, determine if translocation will take the form of seed collection and deposition, or transplanting the plants and surrounding soil as appropriate; (3) develop protocols for irrigation and maintenance of the translocated plants where appropriate; (4) set forth performance criteria (e.g., establishment of quantitative goals, expressed in percent cover or number of individuals, comparing the restored and impacted population) and remedial measures for the translocation effort; and (5) establish a five-year monitoring procedures/protocols for the translocated plants. Five years after initiation of the restoration activities, a report shall be submitted to DCP and CDFW, which shall at a minimum discuss the implementation, monitoring, and management of the restoration activities over the five-year period and indicate whether the restoration activities have, in part or in whole, been successful based on the established performance criteria. The restoration activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP, and CDFW.	Applicant for individual project	DCP, CDFW	Prior to project approval: review and approve the Plant Relocation Plan During construction (including excavation, grading, and demolition): monitor compliance Five years after restoration activities or as extended: review and approve the restoration report

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
4.3-1(d) Adaptive Management Plan			
If indicated as appropriate in a reconnaissance, pre-construction or focused survey required in Mitigation Measure 4.3-1(a), (b), or (c) the biologist shall prepare an Adaptive Management Plan for future operations to ensure that operations will not result in impacts to special status species, such as lighting plans, fencing plans, revegetation plans, and/or necessary covenants to ensure property owners maintain their properties in a way to reduce impacts to native species, such as requirements for keeping domestic animals or use of non-native vegetation, and/or education campaigns. Applicants shall prepare necessary documentation and provide adequate assurances to ensure compliance with ongoing operational requirements, including, but not limited to, such measures as filing of covenants, creation of funding mechanism, or provision of bonds.	Applicant for individual project	DCP, CDFW	Prior to project approval: review and approve Adaptive Management Plan; condition to obtain necessary assurances and commitments for continued compliance Prior to issuance of building permit: ensure necessary assurances for continued compliance obtained
4.3-2(a) Habitat Mitigation and Monitoring Plan			
For discretionary projects that are in areas potentially containing sensitive natural communities or jurisdictional waters and riparian habitat, including streams, wetlands, riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project, prior to the project approval, the applicant shall prepare and submit a Habitat Mitigation and Monitoring Program (HMMP), which shall mitigate for impacts to CDFW jurisdictional habitat at a 2:1 ratio for permanent impacts and a 1:1 ratio for temporary impacts, or as otherwise approved by CDFW and the City. The HMMP shall mitigate for impacts to jurisdictional areas via an acceptable mitigation approach that involves one or a combination of the on-site or off-site restoration or enhancement of degraded in-kind habitats, preservation of in-kind habitats, or by a contribution to an in-lieu fee program approved by the City, CDFW (and USACE, RWQCB, if applicable). The final HMMP shall be developed by a qualified biologist, restoration ecologist or resource specialist and submitted to and approved by the City and CDFW (USACE, RWQCB, if applicable), in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code Section 1602 and supporting regulations, prior to issuance	Applicant for individual project	DCP, CDFW If applicable: U.S. Army Corps of Engineers (USACE), Los Angeles Regional Water Quality Control Board (RWQCB)	Prior to project approval: review and approve the Habitat Mitigation and Monitoring Program (HMMP); verify approval from CDFW Annually after issuance Certificate of Occupancy: review and approve the annual reports regarding the HMMP Five years after issuance of Certificate of Occupancy: review and approve the final report

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
of a grading permit for the project. In broad terms, this Program shall at a minimum include: • Description of the project/impact and mitigation sites; • Specific objectives; • Success criteria; • Plant palette; • Implementation plan; • Maintenance activities; • Monitoring plan; and • Contingency measures. Success criteria shall at a minimum be evaluated based on appropriate survival rates and percent cover of planted native species, as well as eradication and control of invasive species within the restoration area. The target species and native plant palette, as well as the specific methods for evaluating whether the project has been successful at meeting the above-mentioned success criteria shall be determined by the qualified biologist, restoration ecologist, or resource specialist and included in the HMMP. The HMMP shall be implemented over a five-year period and shall incorporate an iterative process of annual monitoring and evaluation of progress and allow for adjustments to the program, as necessary, to achieve desired outcomes and meet success criteria. Annual reports discussing the implementation, monitoring, and management of the HMMP shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable). Five years after project start, a final report shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable), which shall at a minimum discuss the implementation, monitoring and management of the mitigation project over the five-year period, and indicate whether the HMMP has met the established success criteria. The annual reports and the final report shall include as-built plans submitted as an appendix to the report. Restoration will be considered successful after the success criteria have been met for a period of at least two years without any maintenance or remediation activities other than invasive species control. The project shall be extended if the success criteria have not been met at the end of the five-year period to the satisfaction of the City and the CDFW (USACE, RWQCB, if applicable).			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
4.3-2(b) Protected Tree and Tree Canopy Survey			
For discretionary projects that include the removal of trees, prior to project approval, a tree report and tree replanting plan shall be conducted by a certified arborist to tag and assess all trees (defined as woody plant material that is five inches or greater in diameter at breast height [DBH – four and a half feet off grade]) subject to the City's Protected Tree Ordinance on the project site. Trees shall be tagged to correspond with a tree exhibit map. Also, the genus and species of the trees, size of the trees at DBH, and structure and vigor of the trees shall be determined, and an evaluation of the trees' resource value (i.e., the biological impacts of the tree removals, potential to be considered wildlife habitat, and locating trees deserving protection) shall be completed. All protected trees shall receive a visual tree assessment (VTA – meaning tree observations shall be from the ground and that no special devices [e.g., increment borers, drills] shall be used). Following the completion of the tree survey, the arborist shall prepare a report that shall at a minimum provide a description of the general character of the trees on the site and identify opportunities and constraints for preservation. The report and tree replanting plan shall be provided to the City for review. As part of the assessment, a plot plan shall also be prepared indicating the location, type, and canopy coverage of all existing trees on the site and within the adjacent public right(s)-of-way. Based on the results of the tree survey, development plans shall be clustered to maximum extent feasible in order to avoid impacts to sensitive natural communities (e.g., oak woodlands, riparian habitats, extensive tree canopy) and to maintain the largest and most contiguous area of sensitive communities on the site. Additionally, the development plans shall include a proposed minimum buffer to protect adjacent sensitive communities. Development plans that impact sensitive natural communities shall include a detailed feasibility analysis showing how the design has accomplished these avoidance strategies; the City shall not approve development plans until the site design has adequately demonstrated maximum avoidance of sensitive natural communities to the satisfaction of City Planning. Further, removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.	Applicant for individual project	DCP, Department of Public Works (DPW), Urban Forestry Division (UFD), Bureau of Street Services (BSS)	Prior to project approval: review and approve tree report, tree planting plan, and plot plan of all existing trees on-site and adjacent public rights of way; review project for compliance with mitigation requirement to avoid sensitive natural communities: condition project to comply with tree replanting plan and site plan and provide necessary assurances for compliance Prior to issuance of grading permit: review site plans for compliance with conditions and obtain necessary assurances During construction: monitoring

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
The following measures shall be implemented in addition to those required under the City's Protected Tree Ordinance (Ordinance No. 177,404) to avoid and/or compensate for potential indirect impacts to preserved sensitive natural communities before, during, and following construction activities. *Pre-Construction* • Fencing: Protective fencing at least three feet high with signs and flagging shall be erected around all preserved sensitive natural communities where adjacent to proposed vegetation clearing and grubbing, grading, or other construction activities. The protective fence shall be installed at a minimum of five feet beyond the tree canopy dripline. The intent of protection fencing is to prevent inadvertent limb/vegetation damage, root damage and/or compaction by construction equipment. The protective fencing shall be depicted on all construction plans and maps provided to contractors and labeled clearly to prohibit entry, and the placement of the fence in the field shall be approved by a qualified biologist prior to initiation of construction activities. The contractor shall maintain the fence to keep it upright, taut and aligned at all times. Fencing shall be removed only after all construction activities are completed. • Pre-Construction Meeting: A pre-construction meeting shall be held between all site contractors and a registered consulting arborist and/or a qualified biologist. All site contractors and their employees shall provide written acknowledgement of their receiving sensitive natural community protection training. This training shall include, but shall not be limited to, the following information: (1) the location and marking of protected sensitive natural communities; (2) the necessity of preventing damage to these sensitive natural communities; and (3) a discussion of work practices that shall accomplish such. *During Construction* • Fence Monitoring: The protective fence shall be monitored regularly (at least weekly) during construction activities to ensure that the fencing remains intact and functional, and that no encroachment has occurred into the protected natural community; any repairs to the fence or encroachment correction shall be conducted immediately. • Equipment Operation and Storage: Contractors shall avoid using heavy equipment around the sensitive natural communities. Operating heavy machinery around the			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
root zones of trees would increase soil compaction, which decreases soil aeration and, subsequently, reduces water penetration into the soil. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected zones, unless where specifically approved in writing and under the supervision of a registered consulting arborist and/or a qualified biologist. • Materials Storage and Disposal: Contractors shall not store or discard any construction materials within the fenced protected zones and shall remove all foreign debris within these areas. The contractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. Contractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (anti-freeze) shall be disposed of properly. The contractors shall ensure that equipment be parked at least 50 feet, and that equipment/vehicle refueling occur at least 100 feet, from fenced protected zones to avoid the possibility of leakage of equipment fluids into the soil. • Grade Changes: Contractors shall ensure that grade changes, including adding fill, shall not be permitted within the fenced protected zone without special written authorization and under supervision by a registered consulting arborist and/or a qualified biologist. Lowering the grade within the fenced protected zones could necessitate cutting main support and feeder roots, thus jeopardizing the health and structural integrity of the tree(s). Adding soil, even temporarily, on top of the existing grade could compact the soil further, and decrease both water and air availability to the tree roots. Contractors shall ensure that grade changes made outside of the fenced protected zone shall not create conditions that allow water to pond. • Trenching: Except where specifically approved in writing beforehand, all trenching shall be outside of the fenced protected zone. Roots primarily extend in a horizontal direction forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. A registered consulting arborist shall ensure that all pruning cuts shall be clean and sharp, to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may ultimately result in tree mortality. Use of both root pruning and Air-Spade equipment shall be accompanied only by			

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hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary. • Erosion Control: Appropriate erosion control best management practices (BMPs) shall be implemented to protect preserved sensitive natural communities during and following project construction. Erosion control materials shall be certified as weed free. • Inspection: A registered consulting arborist shall inspect the preserved trees adjacent to grading and construction activity on a monthly basis for the duration of the grading and construction activities. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the registered consulting arborist following each inspection. *Post-construction* • Mulch: The contractors shall ensure that the natural duff layer under all trees adjacent to construction activities shall be maintained. This would stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The contractors shall ensure that the mulch be kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay causing fungal pathogens. Should it be necessary to add organic mulch beneath retained oak trees, packaged or commercial oak leaf mulch shall not be used as it may contain root fungus. Also, the use of redwood chips shall be avoided as certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any added organic mulch added by the contractors shall be applied to a maximum depth of 4 inches where possible. • Watering Adjacent Plant Material: All installed landscaping plants near the preserved sensitive natural communities shall require moderate to low levels of water. The surrounding plants shall be watered infrequently with deep soaks and allowed to dry out in-between, rather than frequent light irrigation. The soil shall not be allowed to become saturated or stay continually wet, nor should drainage allow ponding of water. Irrigation spray shall not hit the trunk of any tree. The contractors shall maintain a 30-inch dry-zone around all tree trunks. An above ground micro-spray irrigation system shall be used in lieu of typical underground pop-up sprays.			

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• Monitoring: A certified arborist shall inspect the trees preserved on the site adjacent to construction activities for a period of two years following the completion of construction. Monitoring visits shall be completed quarterly, totaling eight visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be prepared. Additionally, any tree mortality shall be noted and any tree dying during the two-year monitoring period shall be replaced at a minimum 3:1 ratio on-site in coordination with the City.			
Cultural Resources			
4.4-1(a) Identification of Built-Environment Historical Resources			
For discretionary projects, the following procedures shall be implemented to identify historical resources, as defined by Public Resources Code Section 21084.1, located on or near a development site and implement appropriate techniques to avoid or reduce significant impacts to historical resources. The City of Los Angeles Historic Resources Survey (SurveyLA) results shall be consulted to determine whether the project area, or adjacent areas, have been subject to previous cultural resources studies and whether historical resources were identified. If a development involves the alteration or demolition of a property 45 years of age or older that was not evaluated in SurveyLA, including sites with a QQQ code, a historical resources evaluation shall be prepared for the development. The evaluation shall be prepared according to the following standards: • The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. • The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and the City of Los Angeles Office of Historic Resources (OHR) to identify any potential historical resources within the Area of Potential Effects.	Applicant for individual project	DCP, Office of Historic Resources (OHR)	Prior to approval of project: check SurveyLA; review and approve any historical resource evaluation and mitigation plan.

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Those buildings and structures required to be assessed in a historical resource evaluation not located in an HPOZ shall be evaluated within their historic context and documented in a report meeting the OHP and OHR guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the OHR for review and concurrence. If, as a result of the cultural resources records search or the subsequent historical resources evaluation, it is determined that the proposed development would result in a significant adverse effect to one or more historical resources, appropriate techniques consistent with the Secretary of Interior Standards to avoid or reduce significant impacts to the degree feasible shall be implemented. Measures to reduce impacts shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary under the circumstance (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a mitigation plan identifying measures for the treatment or protection of character-defining features shall be provided to the City for review. Measures may include but not be limited to mitigation measures 4.4-1(b) to 4.4-1(j) below.			
4.4-1(b) Rehabilitation of Historical Resources			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. If a development proposes alteration or addition to a historical resource to allow for its continued use, the integrity of the resource could be undermined such that it would no longer convey the historical associations that make it eligible for listing. To reduce such impacts, a resource may be rehabilitated in conformance with the Secretary's Standards to allow for continued or new uses while maintaining features that convey the resource's historical significance. Construction of a project as it relates to rehabilitation of a historical resource shall be monitored for compliance with the Secretary's Standards. The construction monitoring shall: • Be performed by a professional meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) for historic architecture with at least five years of demonstrated experience in rehabilitating historic buildings of similar size.	Applicant for individual project	DCP, OHR	Prior to project approval: condition monitoring and necessary assurances of compliance During alteration or addition of a historical resource: monitoring During construction: review and approve the technical memoranda developed throughout the alteration activities

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• Be performed by the professional at regular intervals during the rehabilitation of the historical resource. The intervals shall include, but not necessarily limited to 50 percent, 90 percent, and 100 percent construction. The monitor shall create a technical memorandum at each interval summarizing the findings, making recommendations as necessary to ensure compliance with the Secretary's Standards, and documenting construction with digital photographs. Compliance with the Secretary's Standards shall include the review specifications, tests, and mockups for the treatment of historic building materials. The monitor shall submit the memoranda to City of Los Angeles Office of Historic Resources (OHR) for concurrence. In the event OHR does not concur, all activities shall cease until compliance with the Secretary's Standards is resolved and concurrence is obtained.			
4.4-1(c) Design Requirements for New Construction			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. If a development proposes new construction on a site containing a historical resource, the project design team shall consult with a preservation architect or other qualified professional to ensure that new construction is designed and constructed in accordance with the Secretary of Interior's Standards to ensure the proposed new construction would protect the historic integrity of the historical resource and any adjacent historical resources. The final design shall require the approval of OHR. In the event OHR does not concur, all activities shall cease until compliance with the Secretary's Standards is resolved and concurrence is obtained.	Applicant for individual project	DCP, OHR	Prior to approval of project or building permit: review and approve the design plan During construction: monitoring
4.4-1(d) Relocation and Rehabilitation of Historical Resources			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. For any project for which retention or rehabilitation of a historical resource is not feasible, a feasibility study, subject to City review and approval, shall be prepared weighing the costs, advantages, and disadvantages of relocation, which would preclude the demolition of a resource by removing it intact to another site. If the study concludes it is feasible to	Applicant for individual project	DCP, OHR	Prior to project approval or building permit: review and approve the feasibility study; if relocation is feasible a Relocation and Rehabilitation Plan will be reviewed and approved by OHR

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
relocate the historical resource, the structure's availability shall be advertised in historic preservation websites such as HistoricForSale, Historic Properties, Old Houses, and Preservation Directory and a local newspaper such as the Los Angeles Times for a period of not less than 60 days by the project applicant. Any such relocation efforts shall be undertaken in accordance with a Relocation and Rehabilitation Plan prepared by the party taking possession of the structure to be moved. The Relocation and Rehabilitation Plan shall be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards (PQS) for History, Architectural History, or Architecture, pursuant to 36 CFR 61. The Plan shall include relocation methodology recommended by the National Park Service, which are outlined in the booklet entitled "Moving Historic Buildings," by John Obed Curtis (1979). Upon relocation of the structure to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary's Standards. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to its implementation. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on the historical resource. If after three months it is evident that no party is interested in purchasing the historical resource per the mitigation measure stipulated above, then the Historic American Building Survey (HABS) Level II documentation, as described below in Mitigation Measure 4.4-1(e), would be required to document the important history and architecture of the historical resource. Relocation shall not take place until the historical resource is first recorded pursuant to the HABS Level II requirements. Any relocation activities undertaken by third parties shall be fully completed prior to the commencement of construction activities. The relocated historical resource shall be moved in accordance with all applicable regulatory requirements, including those applicable provisions of Chapter 83 of the Los Angeles Building Code, and shall be moved during off-peak hours so as to avoid potential traffic impacts.			Prior to building permits; verify that relocation of the building has occurred

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4.4-1(e) Historic American Building Survey Documentation			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. If significant historical resources are identified on a development site and avoidance or compliance with the Secretary's Standards is not possible, prior to development activities, the project applicant shall prepare a Historic American Buildings Survey (HABS) Level II documentation for the historical resource and remaining historic property setting. The HABS document shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's PQS for History, Architectural History, or Architecture, pursuant to 36 CFR 61. This document shall record the history and architecture of the property, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated, as appropriate. The property's physical condition, both historic and current, shall be documented through site plans; historic maps and photographs; original as-built drawings; large format photographs; and written data. Building exteriors, representative interior spaces, character-defining features, as well as the property setting and contextual views shall be documented. Field photographs and notes shall also be included. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. The HABS documentation shall be submitted to the National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to the City of Los Angeles Office of Historic Resources (OHR) and Los Angeles Public Library. Per the Secretary of the Interior's Standards for Architectural and Engineering Documentation, preparation of the HABS document serves to "[provide] important information on a property's significance for use by scholars, researchers, preservationists, architects, engineers and others interested in preserving and understanding historic properties."[2]	Applicant for individual project	DCP, OHR	Prior to project approval: review and approve HABS document or condition project to prepare HABS document or and provide necessary assurances to comply Prior to issuance of grading permit: review and approve the Historic American Buildings Survey documentation and/or obtain necessary assurances

[2] National Park Service. "Archaeology and Preservation: Secretary of the Interior's Standards and Guidelines [As Amended and Annotated], Secretary of the Interior's Standards for Architectural and Engineering Documentation," n.d. https://www.nps.gov/history/local-law/arch_stnds_6.htm. Accessed April 9, 2021.

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4.4-1(f) Interpretive Program			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. If avoidance of the historical resource is not feasible, the project shall include an interpretive display located on the property which addresses the historical context and architectural or historical significance of the resource and informs the public about the history and original configuration of the property. The display shall be reviewed and approved by the City prior to installation at a site to be chosen by the City.	Applicant for individual project	DCP, OHR	Prior to project approval: approve interpretive program or condition project to prepare interpretive program and provide necessary assurances for compliance Prior to building permits: review and approve the plan for interpretive program or ensure necessary assurances obtained
4.4-1(g) Construction Monitoring, Salvage, and Reuse			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. If retention of a historical resource is not feasible, and the historical resource is significant for its architectural design or construction method, the project applicant shall retain a qualified architectural historian or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards (PQS) for Architectural History to conduct construction monitoring and salvage during demolition. Any important historic fabric associated with the historical resource's period of significance shall be fully recorded in photographic images and written manuscript notes. Prior to the commencement of demolition, significant material shall be inventoried and evaluated for potential salvage, analysis, reuse, and interpretation. The qualified architectural historian or historic preservation professional shall prepare the necessary written and illustrated documentation in a construction monitoring and salvage report. This document shall record any historically significant construction methods completed during the period of significance as well as document the historical resource's present physical condition through site plans; historic maps and photographs; sketch maps; digital photography; and written data and text. A salvage and reuse plan shall be created, identifying elements and materials that can be saved prior to the issuance of a demolition permit. The plan shall be prepared by a qualified architectural historian or historic preservation professional with demonstrated	Applicant for individual project	DCP, OHR	Prior to project approval or demolition permit: approve salvage and reuse plan or condition project to provide salvage and reuse plan and provide necessary assurances to ensure compliance Prior to issuance of demolition permit: approve salvage and reuse plan and/or obtain necessary assurances During demolition: monitor Prior to issuance of building permit: review and approve the construction monitoring salvage report

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experience in developing salvage and reuse plans. The plan shall be submitted to the City of Los Angeles Office of Historic Resources. Elements and materials that may be salvageable include: windows, doors, roof tiles, decorative elements, framing members, light fixtures, plumbing fixtures, and flooring materials such as tiles and hardwood. The salvageable items shall be removed in the gentlest, least destructive manner possible. The plan shall identify the recipient(s) for the items. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and for Archaeological Documentation for above ground structures. The completed documentation shall be placed on file at the South Central Coastal Information Center, California State University, Fullerton, California; and the City of Los Angeles Public Library. Findings shall be incorporated into the Historic American Buildings Survey (HABS) report.			
4.4-1(h) Temporary Protective Relocation			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. For projects for which development would have the potential to cause damage to a historical resource and the resource cannot be protected in place, if feasible, the resource may be temporarily relocated to prevent such damage. Prior to development, the applicant shall contact stakeholders directly via letter detailing the location of the project site, its potential impact on the resource, project timeframe, identification of the affected resource, proposed procedures for removal resource or parts of resource with affected, where and for how long the resource would be stored, how it would be secured, and other relevant details. Photographic and documentary recordation of the potentially impacted resource shall be completed by a qualified architectural historian meeting the PQS for Architectural History. Prior to any construction or demolition activities that have the potential to damage the resource, elements that cannot be reasonably protected in place shall be carefully removed by a qualified restoration contractor. Each removed element shall be promptly stored at a secured off-site location. Following completion of project construction, reinstallation of each affected element at its original documented location shall occur [by a qualified restoration contractor] with work completed to the satisfaction of the OHR, and the Department of Public Works Bureau of Engineering, and other interested parties. Excavation and construction activities in the vicinity of the	Applicant for individual project	DCP, OHR, DPW	Prior to project approval: condition project to provide notice and to provide necessary assurances to ensure compliance Prior to demolition permit: verify that stakeholders were notified with all required information and/or obtain assurances During and after demolition: field verify reinstallation of affected elements at their original documented location; review and approve the monitoring report

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resource and work conducted by the restoration contractor to remove, store, and replace affected elements, shall be monitored by a qualified historic preservation consultant meeting the PQS for Architectural History and documented in a monitoring report that shall be provided to OHR.			
4.4-1(i) Excavation and Shoring Plan			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. For projects in which excavation and shoring have the potential to damage a historical resource in close proximity to the project site, an excavation and shoring plan shall be implemented to reduce the likelihood that earth-moving activities will result in damage to the historical resource due to earth moving activities. Procedures shall be implemented for shoring system design and monitoring of pre-excavation, grading, and shoring activities: • Excavation and shoring plans and calculations for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems and hired under the excavation subcontractor. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and the recommendations of the Project Geotechnical Engineer. Maximum allowable lateral deflections for the project site are to be developed by the Geotechnical Engineer in consideration of adjacent structures, property, and public rights-of-way. These deflection limits shall be prepared in consideration of protecting adjacent historic resources. The shoring engineer shall produce a shoring design, incorporating tie-backs, soldier piles, walers, or other means of reinforcement, that is of sufficient capacity and stiffness to meet or exceed the strength and deflection requirements. Calculations shall be prepared by the shoring engineer showing the anticipated lateral deflection of the shoring system and its components and demonstrating that these deflections are within the allowable limits. Where tie-back anchors shall extend across property lines or encroach into the public rights-of-way, appropriate notification and approval procedures shall be followed. The final excavation and shoring plans shall include all appropriate details, material specifications, testing and special inspection requirements and shall be reviewed by the Geotechnical Engineer for conformance with the design intent and	Applicant for individual project	DCP, LADBS	Prior to project approval: condition project to prepare excavation and shoring plan and provide necessary assurances to ensure compliance Prior to issuance of grading permit: review and approve the final excavation and shoring plans

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submitted to the Los Angeles Department of Building and Safety (LADBS) for review and approval during the grading permit application submission. The Geotechnical Engineer shall provide on-site observation during the excavation and shoring work. • The general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare an Adjacent Structures Construction Monitoring Plan, subject to review and approval by LADBS, prior to initiation of any excavation, grading, or shoring activities to ensure the protection of adjacent historic resources from damage due to settlement during construction and excavation. The Adjacent Structures Construction Monitoring Plan shall be carried out by a California Professional Land Surveyor and establish survey monuments and document and record through any necessary means, including video, photography, survey, etc. the initial positions of adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. to form a baseline for determining settlement or deformation. Upon installation of soldier piles, survey monuments shall be affixed to the tops of representative piles so that deflection can be measured. The shored excavation and adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. shall be visually inspected each day. Survey monuments shall be measured at critical stages of dewatering, excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results. • Appropriate parties shall be notified immediately, and corrective steps shall be identified and implemented if movement exceeds predetermined thresholds, calculated amounts, or if new cracks or distress are observed in adjacent structures, sidewalks, buildings, utilities, façades, etc. In the event that settlement due to excavation or construction activity causes damage requiring touch-ups or repairs to the finishes of adjacent historic buildings, that work shall be performed in consultation with a qualified preservation consultant and in accordance with the California Historical Building Code and the Secretary's Standards, as appropriate. Foundation systems are to be designed in accordance with all applicable loading requirements, including seismic, wind, settlement, and hydrostatic loads, as determined by the California Building Code and in accordance with the recommendations provided by the Geotechnical Engineer.			

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4.4-1(j) Structural Construction Monitoring			
If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure. For developments in which excavation and shoring have the potential to damage a historical resource in close proximity to the project site, construction monitoring shall be implemented to minimize damage to nearby historical resources. The construction monitoring shall be performed by a licensed structural engineer with at least five years of demonstrated experience in rehabilitating historic buildings of similar size. A survey of the existing foundations and other structural aspects of historical resources in close proximity to the site shall be conducted to establish baseline conditions and provide a shoring design to protect the historical resources from potential damage. The survey shall take place prior to any construction activities. Pot holing or other destructive testing of the below grade conditions on the development site and immediately adjacent to the nearby historical resources may be necessary to establish baseline conditions and prepare the shoring design. A construction monitor shall submit to OHR a pre-construction survey that establishes baseline conditions to be monitored during construction, prior to issuance of any building permit for the development. The monitoring process shall include a meeting with the project contractor prior to the demolition and/or excavation activities to discuss minimizing damage to historical resources in close proximity.	Applicant for individual project	DCP, OHR, LADBS	Prior to project approval: condition project to provide necessary monitoring and provide necessary assurances to ensure compliance Prior to issuance of grading permit: obtain necessary assurances to ensure pre-construction survey, meeting with the project contractor, and monitoring During construction; monitoring compliance
4.4-2 Archaeological Resources			
Discretionary projects that involve ground disturbance in native soils or soils of unknown origin, shall implement the following procedures to identify archaeological resources located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources. A. The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present.	Applicant for individual project	DCP, OHR, affiliated California Native American Tribal Representative	Prior to project approval: review and approve the cultural resources assessment of development; obtain necessary assurances to ensure compliance Prior to grading permit: obtain necessary assurances to ensure compliance During all ground disturbing activities: monitoring if required by cultural resources assessment;

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Archival research should include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). B. If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible. C. Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains. D. Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist. E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards. F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (http://ohp.parks.ca.gov/pages/1054/files/armr.pdf). G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.			if archeological resources are uncovered, verify that a qualified archeologist evaluates and prepares a treatment plan; monitoring to ensure that construction in the area ceases until the treatment plan process is complete

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H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof. I. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. J. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources			

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unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes. K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.			
Geology and Soils			
4.5-1(a) Paleontological Procedures for Discretionary Projects			
For all discretionary projects that involve excavation or grading activities at depths greater than previous disturbance on the respective site(s), prior to the start of construction, the following shall be conducted as discussed in detail below: prepare a resource assessment and records search for the presence of paleontological resources to determine if the project site is underlain by paleontological resources; monitor all excavation and grading activities in areas underlain by soils or geologic units potentially containing paleontological resources; and identify, record, and evaluate all paleontological resources uncovered during project construction and submit a	Applicant for individual project	DCP, OHR, LADBS	Prior to project approval: review and approve the paleontological resource assessment and records search, monitoring plan and worker education plan; condition project to comply with any

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paleontological assessment report to the City for review and approval. In addition, during project construction, the following shall be conducted as discussed in detail below: cease all construction activities in the event of the discovery of paleontological resources; conduct fossil recovery as necessary by a qualified paleontologist; avoid handling of paleontological resources by parties other than the qualified paleontologist responsible for conducting fossil recovery; and resume construction activities only upon clearance by the qualified paleontologist. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less-than-significant level: • Prior to excavation and grading activities, a qualified paleontologist shall prepare a resource assessment and records search for the potential presence of paleontological resources. This assessment shall be informed by records from the Natural History Museum of Los Angeles County. • If the assessment determines the project site is underlain by soils or geologic units with a medium to high potential for containing paleontological resources, a qualified paleontologist shall prepare a monitoring plan, and worker education plan. The paleontologist's assessment and any required monitoring or required worker education plan shall be submitted to the City for review and approval prior to the commencement of construction activities. Any monitoring plan shall include requiring compliance with Mitigation Measure 4.5-1(d) for discovery, salvage and treatment.			monitoring plan or worker education plan
4.5-1(b) Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring			
If required by cultural resources assessment under MM 4.5-1(a), prior to the start of construction, a paleontological monitor shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff, and notice that the identified qualified paleontologist is the only one authorized to handle paleontological find(s), including but not limited to collection and removal. Approved plans shall include statement of WEAP requirement.	Applicant for individual project	DCP, OHR	Prior to grading permits, obtain necessary assurances to ensure WEAP plan requirement are met; ensure plans show WEAP requirement

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4.5-1(c) Construction Monitoring			
If required pursuant to a monitoring plan prepared under MM 4.5-1(a), a paleontologist or designated paleontological monitor shall monitor ground disturbance activities, including the initial five feet below the ground surface, as areas with high paleontological sensitivity may contain resources at shallow depths and within the first five feet. If the paleontological monitor determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated if any new or unforeseen deeper ground disturbances are required. After ground disturbing activities are completed, the paleontologist or designated monitor shall complete and submit a report to the City verifying compliance with the monitoring plan. Monitoring plan shall show on the plans.	Applicant for individual project	DCP, OHR	Prior to grading permits, obtain necessary assurances to ensure monitoring plan compliance, including compliance with mitigation measure 4.5-1(d) for discovery, salvage and treatment; ensure plans show monitoring plan requirements During all ground disturbing activities: monitor compliance Prior to building permit: obtain verification report
4.5-1(d) Fossil Discovery, Salvage, and Treatment			
All discretionary projects shall be subject to the following mitigation measure: Discovery. If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state, and local guidelines, Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s). Fossil Salvage and Treatment. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive	Applicant for individual project	DCP, OHR	Prior to project approval: condition project to comply with requirement and obtain necessary assurances to ensure compliance Prior to grading permit: verify site plan shows requirement and obtain necessary assurances During fossil salvage: monitor compliance

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excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City. The requirements in this mitigation measure shall be shown on plans.			
Hazards and Hazardous Materials			
4.7-2a Environmental Site Assessment			

(1) Applicability Threshold. Discretionary projects that require grading, excavation, or building permit from LADBS and which meet the criteria below shall comply with the standard in (2):
• Located on or within 500 feet of a Hazardous Material site listed on the following databases:
  • SWRCB GeoTracker (refer to https://geotracker.waterboards.ca.gov);
  • DTSC EnviroStor (refer to https://www.envirostor.dtsc.ca.gov/public);
  • DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov);
  • LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/public-records);
  • Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-records-requests);
  • SCAQMD Facility Information Detail (refer to https://xappprod.aqmd.gov/find); or
	Applicant for individual project	DCP, LADBS, Los Angeles Fire Department (LAFD)	Prior to project approval or prior to grading permits: review and approve the Phase I Environmental Site Assessment (ESA), if no Recognized Environmental Conditions (REC), no further documentation required
			If the Phase I ESA identifies a REC and/or if recommended in the Phase I ESA, a Phase II ESA shall also be reviewed for approval
			If Phase II indicates the need for remediation submit remediation plan to DBS and regulatory agency/agencies as appropriate. Submit agency sign off on remediation plan to DBS. Documentation of completion of

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• Located on or within 500 feet of a Hazardous Materials site designated as a RCRA Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or • Located on an Oil Drilling District or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by CalGEM (refer to https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx); or • Located on any land currently or previously designated with an industrial use class or industrial zoning; or • Located on land currently or previously used for a gas station or dry-cleaning facility. Or: • The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station, or dry-cleaner, or otherwise is contaminated with hazardous substances. And: • The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or conditions. (2) A Phase I Environmental Site Assessment (ESA) shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials. If the Phase I ESA identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I ESA, a Phase II ESA shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II ESAs shall be maintained by the Applicant and Owner and made available for review and inclusion in the case file, as applicable, by the appropriate regulatory agency, such as the SWRCB, DTSC, or LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II ESA or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any			remediation shall be submitted to the DBS If oversight or approval be a regulatory agency is not required, review and approve the verification of compliance with and completion of the remediation plan If needed, verify that a No Further Action letter is submitted to LADBS

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permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained by the Applicant and Owner.			
4.7-2b Site Remediation and Health and Safety Plan			
For discretionary projects that require site remediation under MM-HAZ 4.7-2a, if contaminants of concern (COCs) are detected above regulatory action levels, the project applicant shall retain a qualified environmental consultant to prepare a Soil Management Plan (SMP). If the project is under regulatory oversight, the SMP shall be submitted to appropriate agencies (such as SCAQMD, DTSC or others) for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during excavation and grading activities associated with the project to ensure that contaminated soils are properly identified, excavated, and disposed of off-site, as follows: • The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. The SMP shall require the timely testing and sampling of soils so that contaminated soils can be separated from inert soils for proper disposal. The SMP shall specify the testing parameters and sampling frequency. During excavation, Rule 1166 requires that soils identified as contaminated shall be sprayed with water or another approved vapor suppressant or covered with sheeting during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Under Rule 1166, contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. • During the project's excavation phase, the applicant shall remove and properly dispose of impacted materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan, prior to its transfer for treatment and/or	Applicant for individual project	DCP, LADBS	Prior to issuance of grading permit: review and approve the Soil Management Plan; if applicable, verification that appropriate regulatory agency has determined that further remedial action is not required Prior to issuance of building permit: review and approve the Health and Safety plan

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disposal. All impacted soils would be properly treated and disposed of in accordance with SCAQMD Rule 1166. • The project applicant shall commission a site-specific Health and Safety Plan (HASP) to be prepared in compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal-OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the Department of Building and Safety. The HASP shall address, as appropriate, safety requirements that will serve to avoid significant impacts or risks to workers or the public. The HASP shall include emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The HASP shall be signed by all workers involved in the activities associated with the investigation to demonstrate their understanding of the risks of excavation. If remediation is determined to be necessary, the grading permit shall not be issued until the applicable regulatory agency has indicated that further remedial action is not required.			
Hydrology and Water Quality			
4.8-1 Drainage Pattern Alterations and Flood Control			
For any development project that the City has determined based on an expert study will impede or redirect flood flows even with compliance with existing regulations and RCMS, the project shall develop and implement a project-specific Stormwater Pollution Prevention Plan (SWPPP) for compliance with the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. The purpose of the SWMP, similar to the SWPPP, is to maintain during construction and operations the existing drainage patterns of the site and vicinity to the maximum extent feasible, to avoid downstream impacts associated with flooding or water quality degradation from ground disturbance during construction. To address the potential for long-term drainage pattern alterations associated with the placement of future development projects in areas where no development is currently present, the SWMP must also include operational and maintenance BMPs; such BMPs may include but would not be limited to the upkeep of	Applicant for individual projects	DCP, DPW	Prior to issuance of grading permit: review and approve the project specific Stormwater Pollution Prevention Plan

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landscaped/vegetated swales to dissipate stormwater runoff, or the maintenance (dredging and disposal of accumulated materials) of detention basins placed to capture stormwater runoff resulting from the project.			
Noise			
4.10-1(a) Noise Shielding and Silencing			
For all discretionary projects, power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the Project Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. Measure shall be shown on plans.	Applicant for individual projects	DCP, LADBS	Prior to project approval: condition project to comply with measures and to provide necessary assurances to ensure compliance Prior to building permits (including grading, demolition): ensure that requirement shows on plans and necessary assurances are obtained During construction: field verify that power construction equipment includes noise shielding and silencing devices
4.10-1(b) Use of Driven Pile Systems			
For all discretionary projects, driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report. Requirement shall show on plans.	Applicant of individual project	DCP, LADBS	Prior to grading permits: ensure that requirement shows on plans and necessary assurances have been obtained. During construction: field verify that driven, sonic or vibratory pile drivers are avoided

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4.10-1(c) Enclosures and Screening			
For all discretionary projects, all outdoor mechanical equipment shall be enclosed or screened from off-site noise-sensitive uses. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment and off-site noise-sensitive uses.	Applicant of individual project	DCP, LADBS	Prior to project approval: condition project to comply with measures Prior to building permits: ensure mechanical equipment is enclosed or screened During construction: field verify that all outdoor mechanical equipment are screened or enclosed
4.10-1(d) Construction Staging Areas			
Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. Requirement shall show on plans.	Applicant of individual project	DCP, LADBS	Prior to project approval: condition project to comply with measures and to provide necessary assurances to ensure compliance Prior to building permits (including grading, demolition): ensure that requirement shows on plans and necessary assurances are obtained During construction: field verify that construction staging areas are located far from noise sensitive uses when possible and feasible.

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4.10-1(e) Temporary Sound Barriers			
Sound barriers, such as temporary walls or sound blankets, shall be erected between construction activities and noise-sensitive uses when construction activities are located within a line-of-sight to and within 500 feet of noise-sensitive uses. Requirement shall show on plans.	Applicant of individual project	DCP, LADBS	Prior to project approval: condition project to comply with measures and to provide necessary assurances to ensure compliance Prior to building permits (including grading, demolition): ensure that requirement shows on plans and necessary assurances are obtained During construction: field verify that sound barriers between construction activities and noise-sensitive uses are provided
4.10-1(f) Project-Specific Construction Noise Study			
A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for discretionary projects in the City located within 500 feet of noise-sensitive land uses and that have one or more of the following characteristics: ● Two or more subterranean levels or 20,000 cubic yards or more of excavated material; ● Construction duration (excluding architectural coatings) of 18 months or more; ● Use of large, heavy-duty equipment rated 300 horsepower or greater; or ● The potential for impact pile driving. The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (e.g., residences, transient lodgings, schools, libraries, churches [or other places of assembly], hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks), and identify measures to reduce noise exposure. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or	Applicant of individual project	DCP, LADBS	Prior to project approval: review and approve the Construction Noise Study identifying any required mitigation; condition project to comply with noise reduction measures in the Study and provide necessary assurances to ensure compliance Prior to issuance of building permit: obtain necessary assurances for compliance with noise reducing measures During construction: field verify that compliance with mitigation

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durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques may include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise-sensitive land uses. Project Applicants shall be required to comply with all requirements of Mitigation Measures 4.10-1(a) through 4.10-5(e) in addition to any additional requirements identified and recommended by the Construction Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.			plan from Construction Noise Study
4.10-2 Project-Specific Operational Noise Study			
A Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for all discretionary housing developments with roof decks and/or pool decks in the City of Los Angeles concurrent with Design Review and prior to the approval of building permits. The Noise Study shall include: ● Description of pertinent noise regulations. ● Analysis of operational noise generated by the project's roof decks and/or pool decks to noise-sensitive land uses. ● Comparison of noise levels to applicable City thresholds, such as if the project's operational noise would exceed 3 dBA in an unacceptable land use category or 5 dBA in an acceptable land use category per the City's land use compatibility guidelines included in the City of Los Angeles General Plan Noise Element. ● If project noise would exceed City thresholds, identification of mitigation measures to reduce noise to below 3dBA in an unacceptable land use category or 5 dBA in an acceptable land use category to the extent feasible. Mitigation measures may include, but would not be limited to, operational restrictions, sound dampening equipment, or sound walls. ● Each mitigation measure in the Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.	Applicant of individual project	DCP, LADBS	Prior to project approval; review and approve the Noise Study, condition compliance with any mitigation measures and providing necessary assurances to ensure compliance Prior to building permits: ensure mitigation measures are on plans and obtain necessary assurances

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● Applicant/owners shall comply with the mitigation plan and include the measures in construction contracts. ● Mitigation plan shall be included on plans.			
4.10-3(a) Vibration Control Plan			
For construction activity for discretionary projects involving vibratory rollers or sonic pile drivers within 50 feet of an extremely fragile building (non-engineered masonry) or historical resource (designated or in SurveyLA or other City recognized survey), the Applicant shall prepare a Vibration Control Plan. The Vibration Control Plan requirement shall also apply to use of impact pile drivers within 140 feet of extremely fragile buildings or historical resources or residential structures. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to: ● Use of drilled piles or similar method rather than impact pile driving ● Use of rubber-tired equipment rather than metal-tracked equipment ● Avoiding the use of vibrating equipment when allowed by best engineering practices The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected extremely fragile buildings/historical resources. The survey letter shall provide a shoring design to protect the extremely fragile buildings/historical resources from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the Contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24). A Statement of Compliance, in a form approved by the City, committing the Applicant and Owner to complying with the measure shall be signed by the Applicant and Owner is required to be submitted to the Los Angeles Department of Building and Safety (LADBS) at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above shall be documented by a qualified structural engineer, and	Applicant of individual project	DCP, LADBS	Prior to project approval or grading permit: review and approve Vibration Control Plan or condition project to prepare Vibration Control Plan and provide necessary assurances to ensure compliance Prior to issuance of grading permit: review and approve the Vibration Control Plan and/or obtain necessary assurances; Vibration Control Plan showing on the plans During construction; monitoring

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shall be provided to the City upon request. Vibration Control Plan shall show on the plans.			
4.10-3(b) Vibration Mitigation			
For all discretionary projects: ● Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or similar methods are alternatives that shall be utilized where geological conditions permit their use. ● Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices. Requirement to be on plans.	Applicant of individual project	DCP, LADBS	Prior to project approval: condition project to comply with measures and to provide necessary assurances to ensure compliance Prior to building permits (including grading, demolition): ensure that requirement shows on plans and necessary assurances are obtained During construction: verify that vibrating equipment is avoided
Public Services			
4.12-1(a) Design Plans Review			
For discretionary projects with more than 300 housing units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, prior to the start of construction, design plans shall be submitted to the LAFD that demonstrate the use of construction and design features that reduce fire potential and/or promote containment, including increased spacing between buildings, noncombustible roofs, fire-resistant landscaping, and special irrigation facilities. Design features shall be reviewed and approved by the LAFD prior to project approval. Upon completion of project construction, a diagram of each portion of the property, including access routes and any additional information that might facilitate fire and emergency medical response, shall be submitted to the LAFD.	Applicant of individual project	DCP, LAFD	Prior to project approval: condition project to submit design plans to LAFD; condition project to provide necessary assurances to ensure compliance Prior to issuance of building permit: review and approve design plans; obtain necessary assurances

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4.12-1(b) Emergency Access			
For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, during demolition and construction of discretionary projects, access roads and alleyways shall remain clear and unobstructed in order to ensure access for emergency vehicles. If road closures during construction are necessary, prior to the issuance of a building permit for the discretionary project, a detailed Construction Management Plan including street closure information, a detour plan, haul routes, and a staging plan, shall be prepared and submitted to the Los Angeles Fire Department and the Los Angeles Department of Transportation for review and approval. Furthermore, if emergency access gates are provided on a project access road, the gates shall be equipped with approved locking devices for both Los Angeles City and County Fire Departments on both sides of the gate. Signs shall be provided on the project access road.	Applicant of individual project	DCP, LAFD, Los Angeles Department of Transportation (LADOT)	Prior to project approval: review and approve Construction Management Plan or condition project to provide Construction Management Plan; condition project to provide necessary assurances. Prior to issuance of building permit: review and approve the Construction Management Plan with construction road closure details; obtain necessary assurances
4.12-1(c) Hillside Fire/Vegetation Management Plan			
For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, projects shall have a 200-foot minimum Fuel Management Zone in place, and it shall be cleared annually, around each structure on the project site. A Fire/Vegetation Management Plan for the Fuel Management Zone shall be prepared that requires the following: all-natural vegetation will be thinned out by 70 percent and all dead vegetation, including grass will be maintained at less than four inches in height; if the zone is not irrigated, the area may be covered with chipped biomass four inches deep; no tree limb shall be within 10 feet of a chimney, including outdoor barbeques; trees must be maintained free of dead branches; trees must be limbed up four feet or ⅓ the height of the tree; trees over driveways or roads must be limbed up to 15 feet; the shrub height limit is two feet.	Applicant of individual project	DCP, LAFD	Prior to project approval: approve Fire/Vegetation Management Plan or condition project to provide Fire/Vegetation Management Plan and provide necessary assurances to ensure compliance Prior to issuance of building permit: review and approve the Fire/Vegetation Management Plan; obtain necessary assurances

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Furthermore, the following requirements shall be included in the Fire/Vegetation Management Plan. The following shrubs and trees are highly flammable and shall not be planted on or around the project site: • Sage species (*Salvia* spp.) • Pampas grass (*Cortaderia* spp.) • Cypress (*Cupressus* spp.) • Eucalyptus (*Eucalyptus* spp.) • Juniper (*Juniperus* spp.) • Pine (*Pinus* spp.) • Cedar (*Cedrus* spp.) The following shrubs and trees shall be used for general landscaping to reduce fire hazard associated with flammable vegetation: • Coastal live oak (*Quercus* spp.) • California sycamore (*Platanus racemosa*) • Cottonwood (*Populus fremontii*) • Willow (*Salix* spp.) • Mulefat (*Baccharis salicifolia*) • California bay (*Umbellularia californica*) • California black walnut (*Juglans californica*) • Liquidambar (*Liquidambar styraciflua*) • California lilac (*Ceanothus* spp.) • Toyon (*Heteromeles arbutifolia*) • Mountain mahogany (*Cercocarpus betuloides*) • Holly leaf cherry (*Prunus ilicifolia*) • Dwarf periwinkle (*Vinca minor*) • Grass (*Stipa* spp.) The Fire/Vegetation Management Plan shall be reviewed and approved by the City of Los Angeles Fire Department prior to project approval.			

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4.12-1(d) Submittal of Plot Plan			
For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, submittal of a plot plan for approval by the LAFD shall be required. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. In addition, the following recommendations by the LAFD relative to fire safety may be incorporated into the building plans: • Access for Fire Department apparatus and personnel to and into all structures shall be required. • The entrance to a residence lobby must be within 50 feet of the desired street address curb face. • Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units. • The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. • The Fire Department may require additional vehicular access where buildings exceed 28 feet in height. • Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but, in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof. • Entrance to the main lobby shall be located off the address side of the building.	Applicant of individual project	DCP, LAFD, LADBS	Prior to project approval: require plot plan to be submitted to LAFD Prior to building permit: review and approve the plot plan

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• Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet of the visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department. • Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department. • Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. • The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky. • Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required. • Submit plot plans indicating access road and turning area for Fire Department approval. • Adequate public and private fire hydrants shall be required. • Standard cut-corners will be used on all turns. • Any roof elevation changes in excess of three feet may require the installation of ships ladders. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access. • All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued. • Plans showing areas to be posted and/or painted "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off. • Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy. • All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety			

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communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems. • Helicopter landing facilities are required on all high-rise buildings in the City in accordance with the recently revised Fire Protection Bureau Requirement 10. • Each standpipe in a new high-rise building shall be provided with two remotely located fire department connections (FDCs) for each zone in compliance with NFPA 14-2013, Section 7.12.2.			
4.12-2(a) Crime Prevention Unit Consultation			
For a discretionary project with more than 300 units or on a project site of more than 10 acres, the project applicant shall consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the project, including applicable features in the Los Angeles Police Department's Design Out Crime Guidelines. The crime prevention features recommended by the Los Angeles Police Department's Crime Prevention Unit and agreed to by the project applicant during consultation shall be made part of the project. The plans shall incorporate the design guidelines relative to security, semipublic and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. These measures shall be approved by the Police Department prior to the issuance of building permits.	Applicant of individual project	LADBS, Los Angeles Police Department (LAPD)	Prior to project approval: require applicant to consult with police department and condition project to comply with crime prevention features recommended by LAPD; or condition project applicant to consult with LAPD prior to building permits and provide necessary assurances to ensure compliance Prior to issuance of building permit: review project and provide consultation for crime prevention measures; obtain assurances

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
4.12-2(b) Security During Construction			
During construction of discretionary projects with more than 300 units or with more than 10 acres, private security personnel shall monitor vehicle and pedestrian access to the construction areas and patrol the project site, construction fencing with gated and locked entry shall be installed around the perimeter of the construction site, and security lighting shall be provided in and around the construction site. Furthermore, temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. Low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) shall be provided to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the contractor shall document the security measures; and the documentation shall be made available to the construction monitor.	Applicant of individual project	DCP, LADBS	Prior to project approval: condition project to comply with measure and provide necessary assurances to ensure compliance Prior to building permit: obtain necessary assurances During construction: review and approve documentation of security measures to construction monitor
Transportation			
4.14-1 Construction Management Plan			
Any discretionary project that LADOT determines will have potential impacts to the circulation system even with application of existing regulatory compliance measures, shall prepare a detailed Construction Management Plan (CMP), including street closure information, detour plans, haul routes, and staging plans shall be prepared and submitted to LADOT for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include those elements required by LADOT for the project, which may include but are not limited to the following: • Providing for temporary traffic control during all construction activities adjacent to public right of way to improve traffic flow on public roadways (e.g., flag men) • Prohibition of construction worker parking on any adjacent residential streets	Applicant of individual project	DCP; LADOT; LADBS	Prior to project approval: review and approve construction management plan or condition project to provide construction management plan and provide necessary assurances to ensure compliance Prior to issuance of building permit: review and approve Construction Management Plan; obtain necessary assurances

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• Encouragement of carpool/vanpool of workers
• Prohibitions on construction-related vehicles parking on surrounding public streets
• Prohibitions on construction equipment or material deliveries within the public right-of-way
• Accommodation of all equipment on site as feasible
• Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag men)
• Scheduling of construction activities, including deliveries, to reduce the effect on peak hour traffic flow on surrounding arterial streets
• Rerouting of construction trucks to reduce travel on congested streets to the extent feasible
• Provisions of safety precautions for pedestrians and bicyclists through alternate routing and protection barriers and signage
• Provisions to accommodate the staging and storage of equipment
• Scheduling of construction-related deliveries to reduce travel during commuter peak hours
• Obtain necessary permits for any truck hauling from the City prior to issuance of any permit for the project.
• Noticing and coordination with any nearby schools that may be affected by construction activities, including deliveries, hauling and other construction transportation, to ensure safety of school children.
• Ensuring all feasible safety measures are taken to accommodate safe travel of pedestrian, bicyclists, and other users of the sidewalks around the construction site, including but not limited through the following measures:
  • Construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases.
  • Maintaining adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
• Providing temporary pedestrian facilities adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. • Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. • Keeping sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. • Reopening the sidewalk as soon as reasonably feasible taking construction and construction staging into account.			
4.14-2 Transportation Demand Management Program			
If a discretionary project will have significant impacts to VMT under LADOT Transportation Assessment Guidelines, the Applicant shall prepare a TDM program to reduce VMT impacts below the City's project threshold to the extent feasible. TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy. TDM measures shall include but not be limited to the following examples: TDM strategies applicable for the residential component: Unbundled Parking—Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making. TDM strategies applicable if the project includes an office component: Required Commute Trip Reduction Program—This strategy involves the development of an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The program typically includes elements such as a coordinated ride-sharing or carpooling program, vanpool program, alternative work	Applicant of individual project	LADOT, DCP, LADBS	Prior to project approval: condition project to provide a TDM plan and provide necessary assurances to ensure compliance Prior to building permit: obtain necessary assurances During construction: review and approve the TDM plan Prior to issuance of Certificate of Occupancy: review and approve final TDM plan

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
schedule program, preferential carpool parking, guaranteed ride home service, and a program coordinator. The program requires the development of metrics to evaluate success, program monitoring, and regular reporting. TDM strategies applicable for both the office and residential components: Promotions and Marketing—This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. It can also include more active promotional strategies such as gamification.			
Tribal Cultural Resources			
4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects			
All discretionary projects that involve ground disturbing activities in previously undisturbed soils, shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area. Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP shall include compliance with 4.15-1(b) and will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.	Applicant of individual project	DCP, LADBS	Prior to project approval: review and approve cultural resource assessment report and verify that notification to applicable tribes is provided; if potential impact to cultural resources, review and approve the Cultural Resources Monitoring program; condition project to comply with monitoring program and to provide adequate assurances to ensure compliance During ground disturbing activities: monitor

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4.15-1(b) Discovery of Potential Tribal Cultural Resources			
In the event that Tribal Cultural Resources are discovered during Project activities, whether or not a tribal monitor is present, and there is no CRMP or the CRMP does not cover treatment of inadvertent discovery, all work within a 50-foot buffer of the find shall cease and a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall assess the find. Tribes that are culturally and historically affiliated with the Project area and have requested consultation shall be notified, should any potential tribal cultural resource be discovered during project implementation. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Unless agreed otherwise during the tribal consultation process or in a CRMP, if tribal cultural resources are discovered during construction, the applicant and/or owner shall retain a Qualified Tribal Monitor (as approved by the Tribe) if requested by the Tribe. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes. Any tribal cultural resources discovered shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative and in accordance with federal, state, and local guidelines. If not otherwise provided in the CRMP, the Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources. The location of the find of tribal cultural resources and the type and nature of the find will not be published, except to provide information to the Qualified Archaeologist, tribal representatives, and public agencies with jurisdiction or responsibilities related to the resources. An agreement will be reached with the Tribal Representative to mitigate or avoid any significant impacts to identified tribal cultural resources. Absent an agreement with the Tribal Representative, as provided in Public Resources Code Section 21083.2, the find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur until testing or studies prepared by a Qualified Archaeologist have adequately documented the recovery of scientifically consequential information from and about the resource. Construction activity may continue unimpeded on other portions of the project site if cleared by the Qualified Tribal Monitor or Qualified Archaeologist. Ground Disturbance Activities in the area where resources were found may commence once the identified	Applicant for individual project	DCP, LADBS	Prior to project approval: condition project to comply with measure and provide assurance to ensure compliance Prior to building permit: obtain necessary assurances: ensure measure shown on plans During project activities: if resources are found, field verify that all work within a 50-foot buffer is ceased; verify that affiliated tribal representatives are notified; verify that the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist

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resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist. The measure shall be shown on plans.			
Wildfire			
4.17-1 Hillside Construction Staging and Parking Plan			
For discretionary projects for development located in or adjacent to an SRA or VHFHSZ, where LAFD finds it necessary to add additional conditions above existing regulations to reduce the risk of construction-related activities impairing an emergency response plan or emergency evacuation plan, prior to the issuance of a grading or building permit, the applicant shall submit a Construction Staging and Parking Plan to the Department of Building and Safety and the Fire Department for review and approval. The plan shall identify where all construction materials, equipment, and vehicles will be stored through the construction phase of the project, as well as where contractor, subcontractor, and laborers will park their vehicles so as to prevent blockage of two-way traffic on streets in the vicinity of the construction site. The Construction Staging and Parking Plan shall include, but not be limited to, the following: • No construction equipment or material shall be permitted to be stored within the public right-of-way. • If the property fronts on a designated Red Flag Street, on noticed "Red Flag" days, all workers shall be shuttled from an off-site area, located on a non-Red Flag Street, to and from the site in order to keep roads open on Red Flag days. • During the Excavation and Grading phases, only one truck hauler shall be allowed on the site at any one time. The drivers shall be required to follow the designated travel plan or approved Haul Route. • Truck traffic directed to the project site for the purpose of delivering materials, construction-machinery, or removal of graded soil shall be limited to off-peak traffic hours, Monday through Friday only. No truck deliveries shall be permitted on Saturdays or Sundays.	Applicant for individual project	LADBS, LAFD	Prior to project approval: approve Construction Staging and Parking Plan or condition project to provide a Construction Staging and Parking Plan and to provide necessary assurances to ensure compliance Prior to issuance of grading or building permit: review and approve the Construction Staging and Parking Plan, obtain necessary assurances

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions[1]
• All deliveries during construction shall be coordinated so that only one vendor/delivery vehicle is at the site at one time, and that a construction supervisor is present at such time. • A radio operator shall be on-site to coordinate the movement of material and personnel, in order to keep the roads open for emergency vehicles, their apparatus, and neighbors. • During all phases of construction, all construction vehicle parking and queuing related to the project shall be as required to the satisfaction of the Department of Building and Safety, and in substantial compliance with the Construction Staging and Parking Plan, except as may be modified by the Department of Building and Safety or the Fire Department.			
4.17-3 Undergrounding of Power Lines in and Near an SRA and VHFHSZs			
For all discretionary applications for development located in or within one mile of an SRA or VHFHSZs, that involve or require the installation of new power lines shall be required to install the new power line underground. Prior to the issuance of a grading or building permit, the applicant shall submit plans for undergrounding of power lines.	Applicant for individual project	DCP, LADBS, LADWP	Prior to project approval: condition project to comply and obtain necessary assurances to ensure compliance Prior to issuance of a grading or building permit: review and approve plans for undergrounding power lines; obtain necessary assurances