

ATTACHMENT F

Project Consistency with SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

As a new mixed-use residential project to be developed at an urban infill site within a SCAG-identified High Quality Transit Area (as well as Transit Priority Area [TPA]), the most relevant prior Environmental Impact Reports (EIR) for the Project are the SCAG 2016-2040 and 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Program EIRs (PEIRs), which were adopted by SCAG in 2016 and 2020 respectively. Resources Code (PRC) Section 21151.2 requires that a Transit Priority Project (TPP) also incorporate all feasible mitigation measures, performance standards, or criteria from SCAG's 2020-2045 RTP/SCS PEIR. The Mitigation Monitoring and Reporting Program for the 2020-2045 RTP/SCS PEIR (SCAG MMRP) identified programmatic mitigation measures to be implemented by SCAG and project-level mitigation measures that SCAG encourages local agencies (here, the City of Los Angeles [City]) to implement, as applicable and feasible, as part of project-specific environmental review. The City, as lead agency, has existing regulations, policies, and or standard conditions of approval that address potential impacts. As such, mitigation measures to be implemented by the City are subject to the City's independent discretion as to whether measures are applicable to the project. To comply with PRC Section 21151.2, the City has reviewed all mitigation measures contained in the SCAG MMRP (shown on the following Table) and determined their applicability to the Project. For each mitigation measure, the City considered whether to incorporate the mitigation measure from SCAG's PEIR or whether the applicability of project-level mitigation measures as they relate to the Project are more appropriate and feasible. As demonstrated by the table, the Project substantially conforms with the applicable mitigation measures set forth in SCAG's MMRP through compliance with regulatory requirements as well as implementation of the Project Measures as enforceable Conditions of Approval. As noted in the table, many of the mitigation measures are not applicable to the Project.

Impact	SCAG 2020-2045 RTP/SCS Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
Aesthetics (AES)		
AES-1: Potential to have a substantial adverse effect on a scenic vista.	PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include	No mitigation applies. This mitigation measure does not apply to the Project as Public Resources Code (PRC) Section 21099, enacted by Senate Bill (SB) 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site

	the following or other comparable measures identified by the Lead Agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity, h) Use see-through safety barrier designs (e.g. railings rather than walls).	within a TPA shall not be considered significant impacts on the environment” for purposes of CEQA. “Transit priority area” means an area within one-half mile of a major transit stop that is existing or planned. Section 21064.3 of the PRC defines a “major transit stop” as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. As described in this exemption document under the criterion identified by PRC Section 21155(b)(3), and as confirmed by the City, the Project Site is located within one-half mile of a major transit stop (i.e., the Metro B Line Hollywood/ Highland Station), and is therefore located within a TPA.¹ The Project is a mixed-use residential project located on an infill development site within a TPA, and therefore meets these criteria. Accordingly, the Project’s potential aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099.
AES-2: Potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and	No mitigation required.	No mitigation applies. As described above, PRC Section 21099, enacted by SB 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment,” and as described above under AES-1 , the Project meets

1 City of Los Angeles, ZIMAS, 2020. Parcel information for 6823 Hawthorn Avenue, APN 55548006001. Available at: <http://zimas.lacity.org/>, accessed April 9, 2020.; City of Los Angeles Zoning Information (“ZI”) File No. 2452.

historic buildings within a state scenic highway		these statutory criteria. Moreover, the Project Site is not located along a state scenic highway.
AES-3: Potential to substantially degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.	PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: — use transparent panels to preserve views where sound walls would block views from residences; — use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; and	No mitigation applies. As described above, PRC Section 21099, enacted by SB 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment,” and as described above under AES-1, the Project meets these statutory criteria.

	— construct sound walls of materials whose color and texture complements the surrounding landscape and development. g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.	
AES-4: Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	No mitigation applies. As described above, PRC Section 21099, enacted by SB 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment,” and as described above under AES-1, the Project meets these statutory criteria.

Agricultural and Forestry Resources (AG)		
AG-1: Potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.	PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank² that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	No mitigation applies. This mitigation measure does not apply to the Project as no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance exists on or in the vicinity of the Project Site, ³ nor does any farming or agricultural activity exist on or in the vicinity of the Project Site.
AG-2: Potential to conflict with existing zoning for agricultural	PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as	No mitigation applies. The Project Site is not zoned for agricultural production, there is no farmland at the Project Site, and there are no Williamson Act contracts in effect for

2 The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website. California Department of Fish and Wildlife, Banking. Available at: <https://www.wildlife.ca.gov/Conservation/Planning/Banking>, accessed June 25, 2020.

3 California Department of Conservation, Farmland Mapping & Monitoring Program, 2016 Los Angeles County Map. Available at http://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fgis.conservaion.ca.gov%2Fserver%2Frest%2Fservices%2FDLRLP%2FCaliforniaImportantFarmland_2016%2FFeatureServer&source=sd, accessed May 27, 2020.

use, or a Williamson Act contract.	determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	the Project Site. ⁴ The Project Site is located in an urbanized area of the City and is currently improved with a surface parking lot. Thus, this mitigation measures does not apply to the Project.
AG-3: Potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.	No mitigation applies. The Project Site and surrounding vicinity are not zoned for forest land, timberland, or timberland zoned Timberland Production. The Project Site is located in an urbanized area of the City and is currently improved with a surface parking lot. Thus, this mitigation measure does not apply to the Project.
AG-4: Potential to result in the loss of forest land or conversion of forest land to non-forest use.	<u>PMM AG-3 and MM-GHG-1. See above and below.</u>	No mitigation applies. The Project Site does not include forest land; therefore, no forest land will be lost or converted to non-forest uses. The Project Site is located in an urbanized area of the City and is currently improved with a surface parking lot. Thus, none of the mitigation measures that pertain to agriculture and forestry resources are applicable to the Project. See discussion under PMM-AG-3 and PMM-GHG-1 for discussion of the Project's consistency with those mitigation measures.

⁴ California Department of Conservation, The Williamson Act Status Report, 2017. Available at: https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf, accessed June 26, 2020.

AG-5: Potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	<u>PMM AG-2 and PMM GHG-1.</u> See above and below. PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted. PMM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption	No mitigation applies. Since the Project Site is currently not used for any agricultural uses and is not forest land, no agricultural use or forest land will be converted. The Project Site is located in an urbanized area of the City and is currently improved with a surface parking lot. Thus, none of the mitigation measures that pertain to agriculture and forestry resources are applicable to the Project. See discussion under PMM-AG-2 and PMM-GHG-1 for discussion of the Project's consistency with those mitigation measures.
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	in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	
Air Quality (AQ)		
AQ-1: Potential to conflict with or obstruct implementation of the applicable air quality plan.	No mitigation required.	No mitigation applies.
AQ-2: Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.	PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that	The Project substantially conforms with this mitigation measure as it will comply with existing regulations that have been identified and are required by the Southern California Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB) to facilitate consistency with plans for attainment for the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), as applicable and feasible. Adherence to the following requirements by SCAQMD, CARB, the State of California, and the federal government would further ensure consistency with PMM-AQ-1: Consistent with SCAQMD Rule 403, the following measures shall be incorporated into Project plans and specifications: • Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes. • The construction contractor shall utilize at least one of the following measures at each vehicle egress to a paved public road: - Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; - Pave the surface extending at least 100 feet and at least 20 feet wide;

	could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes—saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts. p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction	- Utilize shaker devices to remove bulk material from tires and vehicle undercarriages; or - Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. • Construction activity on unpaved surfaces shall be suspended when wind speed exceeds 25 miles per hour (such as instantaneous gusts). • Ground cover in disturbed areas shall be replaced as quickly as possible. • Traffic speeds on all unpaved roads shall be reduced to 15 mph or less. • Streets shall be swept at the end of the day if visible soil is carried onto adjacent public paved roads. If feasible, use water sweepers with reclaimed water. • Large bulldozers and excavators shall be suspended during third smog alerts. Consistent with Section 2485 of Title 13 of the California Code of Regulations, the following measures shall be incorporated into Project plans and specifications: • Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site. Consistent with SCAQMD Rule 401 and CARB's In-use Off-road Diesel-Fueled Fleets Regulation, the following measures shall be incorporated into Project plans and specifications: • Equipment and vehicle engines shall be maintained in good condition and in proper tune per manufacturers' specifications. • When possible, electricity shall be utilized from power supply sources rather than temporary gasoline or diesel power generators, as feasible. Compliance with these existing regulations would facilitate consistency with plans for attainment of air quality standards identified by SCAQMD, CARB, the State of California, and the federal government, and would be equal to or more effective than PMM AQ-1. Therefore, the Project would be in substantial conformance with this mitigation measure.
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	equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible. r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v) As applicable for airport projects, the following measures should be considered: a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.	
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	b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w) As applicable for port projects, the following measures should be considered: a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. f. Encourage the participation in the Green Ship Incentives. g. Offer incentives to encourage the use of on-dock rail. x) As applicable for rail projects, the following measures should be considered: a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be	
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	verified during occupancy inspection prior to the issuance of an occupancy permit. z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents. d. Provide information to residents on where MERV filters can be purchased. e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and i. Develop a process for evaluating the effectiveness of the enhanced filtration units. aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities	
AQ-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-	<u>PMM AQ-1</u> . See above.	As discussed above under AQ-1 , the Project would substantially conform with this mitigation measure, as it will comply with existing regulations that have been identified and are required by the SCAQMD and the CARB to facilitate consistency with plans for attainment for the NAAQS and CAAQS, as applicable and feasible.

attainment under an applicable federal or state ambient air quality standard.		
AQ-4: Expose sensitive receptors to substantial pollutant concentrations.	<u>PMM AQ-1.</u> See above.	The Project would be in substantial conformance with this mitigation measure, as it would implement Project measures in conformance with existing regulatory requirements as described above under AQ-1 to reduce the Project's construction-related emissions. In addition, the Project would include multi-family residential units, which would not generate significant operational emissions, as an industrial or warehousing use could be expected to. Therefore, through compliance with existing regulatory requirements, the Project would be in substantial conformance with this mitigation measure, to the extent applicable.
AQ-5: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No mitigation required.	No mitigation applies.
Biological Resources (BIO)		
BIO-1: Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service.	PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of	No mitigation applies. The Project would be developed on an existing urban infill site that is currently improved with surface parking lot. The Project would not be developed on open space, and development of the Project would not result in adverse effects to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife ^{5,6} or U.S. Fish and Wildlife Service, ⁷ or the California Native Plant Society. It would also not result in any adverse effects to any occupied habitat, potentially suitable habitat, or designated critical habitat. Therefore, this mitigation measure would not apply.

5 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS) Available at: www.wildlife.ca.gov/Data/BIOS, accessed September 3, 2020.

6 California Department of Fish and Wildlife, CDFW Lands. Available at: www.wildlife.ca.gov/Lands, accessed on September 3, 2020

7 United States Fish and Wildlife Service, National Wetlands Inventory. Available at: www.fws.gov/wetlands/index.html, accessed September 3, 2020

	the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.	
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	j) Develop an invasive species control plan associated with project construction. k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife. l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance. m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.	<u>PMM BIO-1.</u> See above. PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.	See consistency analysis under PMM BIO-1 above. No mitigation applies. As described under PMM BIO-1 above, the Project would not be developed on sensitive or riparian habitat. Therefore, development of the Project would not result in adverse effects to any sensitive or riparian habitat that could support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

	c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities. g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required. i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities. j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures. k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.	
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	m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
BIO-3: Have a substantial adverse effect on State or Federally Protected Wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means.	<u>PMM BIO-1</u> and <u>PMM BIO-2</u>. See above PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency. a) Require project design to avoid federally protected aquatic resources consistent with the provisions of	See consistency analysis for PMM BIO-1 and PMM BIO-2 under BIO-1 and BIO-2, respectively. No mitigation applies. This mitigation measure does not apply to the Project because the Project Site does not include any protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies.⁸

⁸ United States Fish and Wildlife Service, National Wetlands Inventory. Available at: www.fws.gov/wetlands/index.html, accessed June 2, 2020.

	Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: — Permittee-responsible mitigation — Contribution of in-kind in-lieu fees — Use of in-kind mitigation bank credits — Where avoidance is determined to be infeasible and	
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	d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: — Avoidance; — Impact Minimization; — On-site alternatives; and — Off-site alternatives. e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.	
BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	<u>PMM BIO-1 through PMM BIO-3</u>. See above PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations	See consistency analysis above for PMM BIO-1, PMM BIO-2, and PMM BIO-3 under BIO-1, BIO-2, and BIO-3, respectively. The Project would substantially conform with PMM BIO-4 for the reasons stated below. The Project is located in a developed, urban area and would be replacing the existing surface parking lot. The Project Site is surrounded by other existing urban uses including retail, entertainment, and educational establishments, and the Project would therefore not be developed on or adjacent to any existing open space, habitat area, wildlife nursery, or wildlife corridor. In addition, as discussed in the Tree Report prepared for the Project by Harmony Grove in August 2020 (Attachment J), while no protected trees exist on- or off-site, non-protected street trees existing adjacent to the Project Site may be required to be removed. As described below under BIO-5, any such removals and corresponding street tree replacements would be undertaken in compliance with the policies of the City's Urban Forestry Division, and subject to the approval of the Board of Public Works. In addition, the Project would comply with the requirements of the Migratory Bird Treaty Act (MBTA) and Section 3503 of the California

	protecting fur-bearing mammals, during the breeding season. d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31. e) Prohibit construction activities within 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor. j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas	Department of Fish and Wildlife Code to ensure that potential significant impacts to migratory birds would not occur in connection with any removal of existing trees. Therefore, through compliance with existing regulatory requirements, the Project would substantially conform with this mitigation measure.
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	should also be considered for wildlife crossings for purposes of mitigation. n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: — Wildlife movement buffer zones — Corridor realignment — Appropriately spaced breaks in center barriers — Stream rerouting — Culverts — Creation of artificial movement corridors such as freeway under- or overpasses — Other comparable measures p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.	
BIO-5: Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	<u>PMM BIO-1 through PMM BIO-4</u>. See above PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and	See consistency analysis above for PMM BIO-1, PMM BIO-2, and PMM BIO-3, and PMM BIO-4 under BIO-1 , BIO-2 , BIO-3 , and BIO-4 , respectively.

	feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location	The Project would substantially conform with PMM BIO-5 for the reasons stated below. The Project is located in a developed, urban area and would be replacing existing land uses consisting of a surface parking lot. The Project would not be developed on existing open space or sensitive habitat. As set forth in the Project's tree report (Attachment J), the Project Site does not contain any trees subject to the regulations of the City's protected tree ordinance, and the non-protected street trees to be removed would be replaced in accordance with all applicable City regulations, including the current policies of the City's Urban Forestry Division, and subject to the approval of the Board of Public Works. Furthermore, as discussed under BIO-4, the Project would be required to comply with the MBTA to ensure that potential impacts to migratory birds would not occur in connection with the removal of trees. Therefore, development of the Project will not conflict with any local policies or ordinances protecting biological resources, and would substantially conform with this mitigation measure.
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	on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: — Avoidance strategies — Contribution of in-lieu fees — Planting of replacement trees — Re-landscaping areas with native vegetation post-construction — Other comparable measures developed in consultation with local agency and certified arborist.	
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BIO 6: Potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	<u>PMM BIO-1 through PMM BIO-5</u>. See above PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.	See consistency analysis above for PMM BIO-1, PMM BIO-2, and PMM BIO-3, and PMM BIO-4, and PMM BIO-5 under BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5, respectively. No mitigation applies. The Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.⁹ Furthermore, the Project Site is not within or adjacent to any existing Significant Ecological Area.¹⁰ Therefore, this mitigation measure does not apply.
Cultural Resources (CULT)		
CULT-1: Cause a substantial adverse change in the significance of a historical resource, including tribal cultural	PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such	The Project would substantially conform with this mitigation measure for the following reasons. In compliance with relevant provisions of PMM CULT-1, a Historic Resources Technical Report was prepared for the Project Site by Historic Resources Group in May 2020 (Attachment E).¹¹ As discussed in the report, the Project Site does not

9 California Department of Fish & Wildlife, California Regional Conservation Plans. Available at: www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans, accessed June 26, 2020.
Natural Community Conservation Plans. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed June 26, 2020.

10 Los Angeles County Department of Regional Planning, 2020. Planning & Zoning Information, GIS-NET3 online database. Available at: <http://planning.lacounty.gov/gisnet3>, accessed June 26, 2020.

11 Historic Resources Group, 2020. Historic Resources Technical Report, 6831 Hawthorn Avenue, Hollywood, California. May 2020.

resources, pursuant to § 15064.5.	measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to <i>CEQA Guidelines</i> Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified. b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: — Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. — Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic	contain any historical resources. Two historic districts listed in the National Register of Historic Places (National Register) are located in the near vicinity of the Project Site. Specifically, the Hollywood Boulevard Commercial and Entertainment District contains seven district contributors located in the near vicinity of 6831 Hawthorn Avenue. Four of the nearby district contributors are also individually designated as historic resources and include: • The Hollywood Roosevelt Hotel and Pool ◦ Located approximately 600 feet northwest of the Project Site • The Hollywood Masonic Temple ◦ Located approximately 200 feet northwest of the Project Site • El Capitan Theatre ◦ Located approximately 190 feet northwest of the Project Site • The Max Factor Makeup Salon ◦ Located approximately 230 feet northeast of the Project Site Three additional district contributors are located north of the Project Site and include: • 6800 Hollywood Boulevard ◦ Located approximately 100 feet north of the Project Site • 6806 Hollywood Boulevard ◦ Located approximately 100 feet north of the Project Site • 6904 Hollywood Boulevard ◦ Located approximately 400 feet northwest of the Project Site A second historic district, the Hollywood High School Historic District, is located south of the Project Site and consists of a one-block area made up of five contributing buildings, one contributing site (the athletic field), and three non-contributing buildings. One additional resource located in the near vicinity, 6776 Hawthorn Avenue, was identified as eligible for listing in the NRHP, CRHR and for local listing through survey evaluation.
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	Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval. e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic	Construction of the proposed Project would include substantial foundation work and the construction of subterranean parking which has the potential to cause damage to the El Capitan Theatre and the former Hollywood Masonic Temple from settlement due to the removal of adjacent soil. Vibration associated with construction activity would also have the potential to de-stabilize the adjacent historic buildings.¹² However, construction of the Project would comply with City regulatory requirements regarding the protection of adjacent property during construction (e.g., Los Angeles Municipal Code [LAMC] Section 91.3307.1). In addition, the Project would implement Project Measure PM-CULT-1, below, to ensure the proper protection of the adjacent buildings during construction, and to ensure that adverse indirect impacts from construction would be avoided. PM-CULT-1: Preparation of a Shoring Plan for Affected Historical Resources. The Applicant shall commission preparation of a Shoring Plan by a qualified structural engineer to ensure the protection of adjacent historical resources from potential damage during excavation, grading and construction, and to mitigate the possibility of settlement due to the removal of adjacent soil. Should any subsidence or other unforeseen circumstances arise that may adversely affect the structural integrity of historical resources, construction shall be halted until the qualified engineer is consulted and recommended stabilization measures implemented. The structural engineer shall prepare monitoring logs and provide a monitoring completion report to the City. Specifically, a California Registered Professional Engineer or California Professional Land Surveyor shall prepare an Adjacent Structures Construction Monitoring Plan, subject to review and approval by the City of Los Angeles Building and Safety Department prior to the initiation of any excavation, grading, or shoring activities. The Adjacent Structures Construction Monitoring Plan shall establish survey monuments and document and
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¹² While two additional resources located at 6800 and 6806 Hollywood Boulevard are situated north of the Project Site, they are separated from the Site by a surface parking lot and alley. Given this distance, the potential of Project construction activities to cause damage to these two resources is negligible.

	architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys. i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or	record the positions of adjacent structures, sidewalks, buildings, utilities, facades, surfaces feature, 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. should be visually inspected at a minimum of one time per month. Survey Monuments should be measured at critical stages of excavation, shoring, dewatering, and construction but should not occur less frequently than once every thirty days. Monitoring reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results and distributed to all appropriate parties, including the shoring engineer. Appropriate parties shall be notified if movement exceeds predetermined thresholds and calculated amounts. With compliance with applicable regulatory requirements and implementation of Project Measure PM-CULT-1, which the City has determined is equal to or more effective than the relevant provisions of PMM CULT-1, the Project would substantially conform with this mitigation measure.
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	educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe. j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated. l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.	
CULT-2: Cause a substantial adverse change in the significance of an	<u>PMM CULT-1</u> . See above.	The Project substantially conforms with this mitigation measure. The Project is located within a highly developed urban area on a previously disturbed site and the potential for discovery of archaeological or tribal cultural resources is

archaeological resource, including tribal cultural resources, pursuant to § 15064.5.		considered low. Nonetheless, to ensure there would be no impacts to archaeological resources or tribal cultural resources, the Project would implement the relevant provisions of PMM CULT-1 pertaining to archaeological resources as a condition of approval. These provisions include the requirement that, prior to obtaining a grading permit, a qualified archaeologist be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning and also to the South Central Coastal Information Center (SCCIC) at Cal State University Fullerton. Ground-disturbing activities in the area of the exposed material may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. Furthermore, in the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below: • Upon a discovery of a potential tribal cultural resource, the Project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project; (2) and the Department of City Planning. • If the City determines, pursuant to Public Resources Code Section 21074(a)(2), that the object or artifact
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		appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. • The Project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible. • The Project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City. • If the Project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the Project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Project Permittee shall pay any costs associated with the mediation. • The Project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate. • Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general
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		public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols. Therefore, the project would be in substantial conformance with this mitigation measure.
CULT-3: Disturb human remains, including those interred outside of dedicated cemeteries.	PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional: — Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. — If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to	The Project substantially conforms with this mitigation measure as described below. The Project Site is located within a highly developed urban area on a previously disturbed site and the potential for discovery of human remains is considered low. Nonetheless, compliance with existing regulatory requirements as described below, which the City has determined are equal to or more effective than PMM CULT-2, would ensure there would be no impacts pertaining to the unanticipated identification of human remains. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered unexpectedly during construction demolition and/or grading activities, it is required that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed: - o Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 AM to 5 PM Monday through Friday) or 323-343-0714 (after hours, Saturday, Sunday, and holidays) If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. - o The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

	provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and reburial of the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.
Energy (ENR)		
ENR-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	No mitigation required.	No mitigation applies. Notwithstanding, the Project would be required to comply with California Building Code (Title 24 of the California Code of Regulations [CCR]), which incorporates the requirements of California Green Building Standards (CALGreen) Code. To determine the Project's specific energy and water use, a CEQA Exemption Energy and Water Efficiency Compliance Technical Report was prepared by Zinner Consultants in July 2020 (Attachment G). As shown therein, the Project would be in compliance with the PRC's statutory requirements for a Transportation Priority Project (TPP) building to be designed to be 15 percent more energy efficient than the applicable Title 24 standards and to be designed to achieve 25 percent less water usage than the average household use in the region. Specifically, the Project's energy use would be 16.2 percent less than the standards required by Title 24, Part 6 (2019). Moreover, the Project's water use would be 64.8 percent below the regional baseline. The Project would achieve its energy efficiency through the implementation of multiple measures including, but not limited to, enhanced exterior wall insulation, perforated rainscreen for solar shading, high performance windows, LED light fixtures, high-efficiency heating, ventilation, and air conditioning (HVAC) systems, a centralized hot water system and high-efficiency water fixtures. The Project would achieve its water efficient through multiple measures including high efficiency water using appliances such as tank water closets and faucets, and efficient irrigation systems. Accordingly, through compliance with existing regulatory requirements, the Project would not result in any energy-related adverse effects.
ENR-2: Conflict with or obstruct a state or local	No mitigation required.	No mitigation applies. Nevertheless, the Project would be required to comply with the City's Green Building Code as

plan for renewable energy or energy efficiency.		well as Title 24, which incorporates the requirements of CALGreen Code. Moreover, as demonstrated by the CEQA Exemption Energy and Water Efficiency Compliance Technical Report prepared for the Project by Zinner Consultants in July 2020 (Attachment G), the Project's energy use would be 16.2 percent less than the standards required by Title 24, Part 6 (2019). Additionally, as demonstrated by the CEQA Exemption Energy and Water Efficiency Compliance Technical Report prepared for the Project by Zinner Consultants in July 2020 (Attachment G), the Project's water use would be 64.8 percent below the regional baseline.
Geology and Soils (GEO)		
GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology	No mitigation required.	The Project substantially conforms with this mitigation measure through compliance with existing regulatory requirements. As described in the Preliminary Geotechnical Investigation prepared for the Project by Feffer Geological Consultants in April 2020 and approved by LADBS in June 2020 (Attachment H), the Project would be required to comply with the existing building, grading, and seismic regulations of the City's Building Code, which incorporates the Uniform Building Code (UBC) and California Building Code (CBC). The Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone or a fault zone mapped by the State Geologist pursuant to the Seismic Hazard Mapping Act. ^{13,14} Additionally, the Project Site is not located within a City-designated Fault Rupture Study Area, a City-designated Hillside Area, a landslide area, or a tsunami inundation zone. ^{15,16,17} No active faults are known to pass

13 City of Los Angeles, ZIMAS, 2020. Parcel information for 6823 Hawthorn Avenue, APN 55548006001. Available at: <http://zimas.lacity.org/>, accessed April 9, 2020.

14 Feffer Geological Consulting, 2020. Preliminary Geotechnical Investigation: Proposed Eight Story Structure Over Two Subterranean Levels, 6817-6831 W. Hawthorn Avenue, Los Angeles, California, Tract: Hollywood Bonnie Brier Lot, Lots: 7,9. July 2020.

15 Feffer Geological Consulting, 2020. Preliminary Geotechnical Investigation: Proposed Eight Story Structure Over Two Subterranean Levels, 6817-6831 W. Hawthorn Avenue, Los Angeles, California, Tract: Hollywood Bonnie Brier Lot, Lots: 7,9. July 2020.

16 City of Los Angeles, ZIMAS, 2020. Parcel information for 6823 Hawthorn Avenue, APN 55548006001. Available at: <http://zimas.lacity.org/>, accessed April 9, 2020.

17 Feffer Geological Consulting, 2020. Preliminary Geotechnical Investigation: Proposed Eight Story Structure Over Two Subterranean Levels, 6817-6831 W. Hawthorn Avenue, Los Angeles, California, Tract: Hollywood Bonnie Brier Lot, Lots: 7,9. July 2020.

Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides.		through the immediate Project vicinity. The closest active fault to the Project Site, the Hollywood Fault, is located approximately 0.33 miles to the north of the Project Site.¹⁸ Therefore, the Project Site is not located within a designated earthquake fault or seismic hazard zone. Nevertheless, the Project is located in the seismically active region of Southern California and is susceptible to ground shaking during a seismic event. However, the Project would be required to comply with the existing building, grading, and seismic regulations of the City's Building Code, which incorporates the UBC and CBC. Compliance with these regulations is required by LAMC Section 91.7006, which requires the Los Angeles Department of Building and Safety (LADBS) to review and approve a design-level geotechnical report for the Project prior to the issuance of grading permits. Furthermore, the final geotechnical report would incorporate the building construction and design recommendations contained in the existing geotechnical report prepared for the Project. Accordingly, through compliance with existing regulatory requirements as well as the recommendations of the geotechnical report no adverse effects pertaining to fault rupture, seismic ground shaking, ground failure, liquefaction, or landslides would occur.
GEO-2: Result in substantial soil erosion or the loss of topsoil	PMM GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend	The Project already substantially conforms to this mitigation measure, because the Project would be required to comply with existing regulatory requirements pertaining to erosion and stormwater control, as well as the design and construction recommendations contained in the Preliminary Geotechnical Investigation prepared for the Project (Attachment H). Specifically, a final design-level geotechnical report shall be reviewed and approved by LADBS that incorporates the recommendations of this existing report and demonstrates compliance with the City's existing geology and soils requirements, including but not limited to LAMC Section 91.7013 pertaining to erosion control and drainage devices, Section 91.7014 regarding flood and mudflow protection, and Section 91.7016

¹⁸ Feffer Geological Consulting, 2020. Preliminary Geotechnical Investigation: Proposed Eight Story Structure Over Two Subterranean Levels, 6817-6831 W. Hawthorn Avenue, Los Angeles, California, Tract: Hollywood Bonnie Brier Lot, Lots: 7,9. July 2020.

	remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	regarding regulations for areas that are subject to slides and unstable soils. The Project would also be required to comply with the Construction General Permit Water Quality Order 2009-0009-DWQ as amended by Order No. 2010-0014-DWQ to prevent short-term construction water quality (including erosion and sedimentation issues) impacts. These mandatory requirements would minimize soil erosion and the transmission of sediment into the City's separate storm water sewer system. The Project's construction activities would require grading, excavation, and foundation permits or approvals from the City, which would include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. The Project would also be designed to comply with the City of Los Angeles' Low Impact Development (LID) Ordinance. Therefore, the Project would be in substantial conformance with this mitigation measure.
GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence,	<u>PMM GEO-1.</u> See above.	As described above under GEO-1 , the Project already substantially conforms with this mitigation measure. As described in the Preliminary Geotechnical Investigation prepared for the Project by Feffer Geological Consulting in April 2020 (Attachment H), the Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone or a fault zone mapped by the State Geologist pursuant to the Seismic Hazard Mapping Act. No active faults are known to pass through the immediate Project vicinity, and the Project Site is not within a landslide zone, a

liquefaction, or collapse.		liquefaction zone, a fault rupture study area, or a tsunami inundation zone. The Project Site is located in the seismically active region of Southern California; however, through compliance with existing regulatory requirements as described in the Preliminary Geotechnical Report, the Project would not cause the geologic unit or soil to become unstable as a result of the proposed development, and the Project would thereby not result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, the Project would substantially conform with this mitigation measure.
GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	<u>PMM GEO-1.</u> See above.	The Project already substantially conforms with this mitigation measure. As described in the Preliminary Geotechnical Investigation prepared for the Project by Feffer Geological Consultants in April 2020 (Attachment H), the development of the Project would not result in hazards from future landsliding, settlement, slippage, shrinkage, or expansion, as long as the recommendations presented in the reports are followed (Attachment H). Moreover, pursuant to the City's existing codes and applicable regulations, design and construction of the Project would be required to incorporate any necessary measures to protect against risks associated with expansive soils. These measures include compliance with the City's Building Code, the Rules of General Application of the Grading Division of LADBS, the City's building permit requirements, and site-specific engineering recommendations based upon the recommendations of a licensed geotechnical engineer and a required design-level geotechnical report containing the recommendations of the Preliminary Geotechnical Report, which is to be approved by LADBS.
GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	No mitigation required.	No mitigation applies.
GEO-6: Directly or indirectly destroy a unique paleontological	PMM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation	The Project substantially conforms to this mitigation measure as the Project would be required to comply with existing regulations related to the discovery of unknown

resource or site or unique geologic feature.	measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency: - Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. - Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. - Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. - Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: - All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. - A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during	paleontological resources, should they be encountered during ground disturbing activities as outlined in PMM GEO-2. Specifically, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and: - The services of a paleontologist shall be secured by contacting the Center for Public Paleontology, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. - The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. Construction activity may continue unimpeded on other portions of the Project Site. - The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, regarding conservation or relocation of the resource. - The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report. Therefore, the Project would substantially conform with this mitigation measure.
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	construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP. 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas. e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.	
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Greenhouse Gas Emissions and Climate Change (GHG)		
GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	PMM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: i) Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii) Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii) Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv) Incorporate passive environmental control systems that account for the characteristics of the natural environment. v) Use high-efficiency lighting and cooking devices. vi) Incorporate passive solar design. vii) Use high-reflectivity building materials and multiple glazing. viii) Prohibit gas-powered landscape maintenance equipment. ix) Install electric vehicle charging stations. x) Reduce wood burning stoves or fireplaces. xi) Provide bike lanes accessibility and parking at residential developments. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the <i>State CEQA Guidelines</i>. c) Include off-site measures to mitigate a project's emissions.	The Project substantially conforms with this mitigation measure as described below. The Project's generation of greenhouse gas (GHG) emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Specifically, as set forth in the PRC Section 21155 consistency findings for the Project as well as the RTP/SCS consistency findings under Attachment B, the Project is consistent with SCAG's regional plan for reducing GHG emissions. Therefore, no significant GHG emission impacts would occur for the Project. Additionally, as described in ENR-2, the Project would be in compliance with the PRC's statutory requirements to be designed to be 15 percent more energy efficient than the applicable Title 24 standards and to be designed to achieve 25 percent less water usage than the average household use in the region. Specifically, as stated in the CEQA Exemption Energy and Water Efficiency Compliance Technical Report (Attachment G), the Project's energy use would be 16.2 percent less than the standards required by Title 24, Part 6 (2019). Moreover, the Project's water use would be 64.8 percent below the regional baseline. Therefore, the Project would result in reduced energy consumption and corresponding reduction in GHG emissions, consistent with PMM GHG-1. Furthermore, as demonstrated in the Transportation Assessment prepared for the Project by Gibson Transportation Consulting, Inc. in July 2020 (see Attachment I), the Project would not conflict with measures of effectiveness for the performance of the circulation system. Specifically, the Project would not conflict with or be inconsistent with applicable City transportation plans or policies, would not result in any impacts pertaining to vehicle miles traveled (VMT), and would not result in any increased hazards due to a geometric design feature. In addition, the Project would comply with applicable vehicular and bicycle parking requirements. During operation, the Project would encourage the utilization of transit due to its close proximity to these bus lines and the Metro B Line Station in the greater vicinity of the Project Site,

	d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: i) Use energy and fuel-efficient vehicles and equipment; ii) Deployment of zero- and/or near zero emission technologies; iii) Use lighting systems that are energy efficient, such as LED technology; iv) Use the minimum feasible amount of GHG-emitting construction materials; v) Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi) Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii) Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii) Incorporate design measures to reduce water consumption; ix) Use lighter-colored pavement where feasible; x) Recycle construction debris to maximum extent feasible; xi) Plant shade trees in or near construction projects where feasible; and xii) Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: i) Promote transit-active transportation coordinated strategies; ii) Increase bicycle carrying capacity on transit and rail vehicles; iii) Improve or increase access to transit; iv) Increase access to common goods and services, such as groceries, schools, and day care;	and adjacent and nearby bicycle lanes. The redevelopment of the Project Site with new residential and neighborhood serving café uses will enhance the pedestrian environment along Hollywood Boulevard and encourage additional foot traffic along this corridor. The Project would also include bicycle parking for its residents and patrons of its commercial uses in compliance with LAMC requirements, further facilitating non-vehicular forms of travel to and from the Project Site. Collectively, these Project features and conditions as well as the Project's required regulatory compliance would result in reduced energy consumption, reduced VMT, and corresponding reduction in GHG emissions, consistent with PMM GHG-1.
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	v) Incorporate affordable housing into the project; vi) Incorporate the neighborhood electric vehicle network; vii) Orient the project toward transit, bicycle and pedestrian facilities; viii) Improve pedestrian or bicycle networks, or transit service; ix) Provide traffic calming measures; x) Provide bicycle parking; xi) Limit or eliminate park supply; xii) Unbundle parking costs; xiii) Provide parking cash-out programs; and xiv) Implement or provide access to commute reduction program. f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: i) Provide car-sharing, bike sharing, and ride-sharing programs; ii) Provide transit passes; iii) Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv) Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v) Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;	
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	vi) Provide employee transportation coordinators at employment sites; vii) Provide a guaranteed ride home service to users of non-auto modes. i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j) Land use siting and design measures that reduce GHG emissions, including: i) Developing on infill and brownfields sites; ii) Building compact and mixed-use developments near transit; iii) Retaining on-site mature trees and vegetation, and planting new canopy trees; iv) Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v) Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.	
GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	<u>PMM GHG-1</u>. See above.	The Project would substantially conform with this mitigation measure. As discussed under GHG-1, the Project's generation of GHG emissions would not be considered considerable, as the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Specifically, as set forth in the PRC Section 21155 consistency findings for the Project as well as the 2020-2045 RTP/SCS consistency findings under Attachment B, the Project is consistent with the 2020-2045 RTP/SCS, which is SCAG's regional plan for reducing GHG emissions. See discussion under GHG-1 for

		further discussion of the Project's consistency with this mitigation measure.
Hazards and Hazardous Materials (HAZ) Hazards and Hazardous Materials		
HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate. c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: — The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. — The location of such hazardous materials.	The Project already substantially conforms to this mitigation measure. Project construction would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials can include paints, adhesives, surface coatings, cleaning agents, fuels, and oils. However, construction activities would be contained on the Project Site, which would cause potential emissions to be minimal and contained. Moreover, all potentially construction-related hazardous materials would be transported, stored, used, and disposed of in compliance with all applicable regulatory requirements, thereby ensuring that the risk of potential impacts related to hazardous materials during construction would be less than significant. As a mixed-use residential development, Project operation does not involve the routine transport, use, or disposal of significant amounts of potentially hazardous materials. Any potentially hazardous materials used would be similar to any other residential urban development, examples of which would include cleaning solvents, paints, and pesticides for landscaping. These potentially hazardous materials would be in and stored in accordance with regulatory requirements and manufacturers' instructions. Furthermore, the Project would adhere to regulatory requirements concerning source hazardous waste reduction measures and all applicable City ordinances. The localized nature of the potentially hazardous materials, adherence to regulatory requirements, and other best management practices such as proper use and storage ensure that impacts related to the routine transportation, use, and disposal of hazardous materials would be less than significant. Therefore, with implementation of the regulatory requirements, the Project would substantially conform with this mitigation measure.

	— An emergency response plan including employee training information. — A plan that describes the way these materials are handled, transported and disposed. d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. e) Avoid overtopping construction equipment fuel gas tanks. f) Properly contain and remove grease and oils during routine maintenance of construction equipment. g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident. o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified. p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.	
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HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	<u>PMM HAZ-1.</u> See above. PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following: a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.	The Project would substantially conform with this mitigation measure. As described above, under HAZ-1, the Project would substantially comply with PMM HAZ-1 through compliance with all applicable regulatory requirements. Specifically, during construction, all potentially hazardous materials encountered and used at the Project Site would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. This ensures that potential risks associated with construction related activities are minimized. In addition, any potentially hazardous materials used during Project operation would be similar to any other residential urban development (e.g., cleaning solvents, paints, and pesticides for landscaping), and these potentially hazardous materials would be in and stored in accordance with regulatory requirements and manufacturers' instructions. Furthermore, the Project would adhere to regulatory requirements concerning source hazardous waste reduction measures and all applicable City ordinances. Furthermore, as part of the ESA - Phase I, PEA prepared for the Project by California Environmental in May 2020 (Attachment D), a review of all major governmental databases was conducted any information related to hazardous materials on, or in the immediate vicinity, of the Project Site. While results showed that nearby properties were listed in the regulatory databases, the Project Site itself was not identified in any of the regulatory databases reviewed. Based upon the review of all pertinent Regulatory Documents, the ESA - Phase I, PEA concluded that there is only a low potential for any toxic or hazardous contamination to the Project Site from any of these off-site listed sources.¹⁹ Therefore, due to the lack of existing contamination at the Project Site as well as the Project's compliance with the applicable regulatory requirements, impacts pertaining to the release of or exposure to hazardous substances would be minimized and the Project would substantially conform with this mitigation measure.
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19 California Environmental, 2020. Environmental Site Assessment – Phase I, Preliminary Endangerment Assessment (PEA) Report Format. May 2020.

HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	<u>PMM HAZ-1 and PMM HAZ-2.</u> See above. PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	As described above, under HAZ-1 and HAZ-2, the Project would substantially conform with PMM HAZ-1 and PMM HAZ-2, to the extent applicable. The nearest school to the Project Site is Hollywood High School, which is less than 500 feet away, located directly south of the Project Site. The Project would not emit or handle hazardous materials or substances other than those typical in other multi-family residential developments during operation. In addition, all potentially hazardous materials encountered during construction would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations and, thus, there would be minimal adverse effects. Therefore, the effects from the potential emission and handling of hazardous materials near a school would be minimal and the Project would substantially conform with this mitigation measure.
HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered	The Project would substantially conform with these mitigation measures for the reasons stated below. The Project Applicant has prepared an ESA - Phase I, PEA for the Project Site. As part of the ESA - Phase I, PEA (Attachment D) prepared for the Project Site, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. The databases searched as a result of Government Code Section 65962.5 are known as the "Cortese List" and include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency. No hazardous materials that may pose a risk at or to the Project Site were listed in the databases, and the Project Site is not identified as a hazardous materials site. While results showed that nearby properties were listed in the regulatory databases, the Project Site itself was not identified in any of the regulatory databases reviewed. Based upon the review of all pertinent Regulatory Documents, the ESA - Phase I, PEA concluded that there is only a low potential for any toxic or hazardous contamination to the Project Site from any of these off-site listed sources.

	Environmental Assessor, Professional Geologist, or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected	Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment and the Project would substantially conform with this mitigation measure.
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	until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.	
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	n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area	No mitigation required.	No mitigation applies.
HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or	<u>PMM HAZ-1 through PMM HAZ-4, and PMM TRA-2. See above and below.</u> PMM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead	The Project already substantially conforms with this mitigation measure through compliance with existing regulatory requirements as well as incorporation of specific Project Measures. Specifically, an emergency response plan would be submitted to the Los Angeles Fire Department

emergency evacuation plan	Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.	(LAFD) during LAFD's review of the Project plans as part of the standard building permit review process per LAMC Section 57.118 (see PSP-1). Moreover, the Project does not propose permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. Furthermore, no full road closures are anticipated during construction of the Project. As described in TRA-4 , below, the Project would implement Project Measure PM-TRA-1 , which requires the preparation of and City approval of a Construction Traffic Management Plan. Therefore, incorporation of these measures would achieve conformance with PMM TRA-4.
HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	<u>PMM WF-1.</u> See below.	The Project already substantially conforms with this mitigation measure because the Project Site is located in a fully urbanized area. There are no wildlands in the vicinity, and the Project Site is not near a wildland fire hazard area. ²⁰ Furthermore, the Project is subject to regulatory requirements, such as adherence to Fire Code requirements and submitting a fire safety plan to the Lead Agency and local fire agency for their review and approval per LAMC Section 57.118
Hydrology and Water Quality (HYD)		
HYD-1: Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	PMM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	The Project would substantially conform with this mitigation measure, because the Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. Specifically, a final design-level geotechnical report shall be reviewed and approved by LADBS that incorporates the recommendations of the Project's existing Preliminary Geotechnical Investigation and demonstrates compliance with the City's existing geology and soils

²⁰ City of Los Angeles, ZIMAS, 2020. Parcel information for 6823 Hawthorn Avenue, APN 55548006001. Available at: <http://zimas.lacity.org/>, accessed April 9, 2020.

	a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.	requirements, including but not limited to LAMC Section 91.7013 pertaining to erosion control and drainage devices, LAMC Section 91.7014 regarding flood and mudflow protection, and LAMC Section 91.7016 regarding regulations for areas that are subject to slides and unstable soils. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. During operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and best management practices (BMPs) that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions, and would require the implementation of BMPs, which would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Therefore, through compliance with existing regulatory requirements, the Project would conform with this mitigation measure.
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	k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.	
HYD-2: Potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious	The Project would substantially conform to this mitigation measure, because it will comply with existing regulations regarding low-impact development and water quality, including the capture and reuse of stormwater. Moreover, as described in the Preliminary Geotechnical Investigation prepared for the Project by Feffer Geological Consulting in April 2020 (Attachment H), subsurface explorations have been performed at the Project Site and groundwater was not encountered to a depth of 86.5 feet below grade surface (bgs). Furthermore, historically high groundwater levels have been between 80 and 100 feet bgs in the vicinity of the Project Site. Given that the Project is only proposing two subterranean parking levels, the likelihood of encountering groundwater and/or requiring dewatering is very low; however, should shallower or perched groundwater be encountered during construction, temporary dewatering would be performed in accordance with all applicable regulatory requirements including National Pollutant Discharge Elimination System (NPDES) requirements. Accordingly, compliance with existing regulatory requirements would avoid or reduce potential impacts to groundwater resources that are within the jurisdiction and

	surfaces, including the use of in-lieu fees and off-site mitigation. b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	authority of the SWRCB, LARWQCB, Water Districts, and other groundwater management agencies.
HYD-3a: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.	<u>PMM HYD-1</u>. See above.	As discussed under HYD-1, the Project would substantially conform to this mitigation measure, because the Project would comply with existing regulatory requirements including the City's LID Ordinance and grading/erosion control requirements. Runoff associated with the Project would be either directed in non-erosive drainage devices to landscaped areas for evaporation and/or directed to the existing City storm drain system, captured in on-site below grade cisterns, and/or directed to the existing City storm drain system, and thus, would not encounter exposed soils. With the development of the Project, the Project Site's current largely impervious nature would be maintained, and the Project's drainage pattern would be generally similar to the existing pattern at the Project Site currently by conveying runoff to the City storm drain system. Thus, pursuant to existing regulatory requirements, construction and operation of the Project would not result in substantial hydrological changes or erosion or siltation on- or off-site, nor would the Project result in the alteration of the course of a stream or river.
HYD-3b: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of flooding on- or off-site.	<u>PMM HYD-1 and PMM HYD-2</u>. See above.	As described above under HYD-1, the Project would substantially conform to these mitigation measures, as it would not substantially alter the existing drainage pattern of the area surrounding the Project Site, and would comply with existing regulatory requirements regarding stormwater and erosion control. Furthermore, given that there are no waterbodies within or near the Project Site, and the Project Site is not located within a designated flood zone, flooding is not expected to occur on- or off-site. Therefore, the Project would substantially conform with these mitigation measures.

HYD-3c: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	<u>PMM HYD-1 and PMM HYD-2.</u> See above.	As discussed under HYD-1, the Project would substantially conform to these mitigation measures, because the Project would be subject to the provisions of the LID Ordinance and runoff associated with the Project would be directed in non-erosive drainage devices to either landscaped areas for evaporation, captured and conveyed to on-site below grade cisterns, and/or directed to the existing City storm drain system. Pursuant to the City's review of the Project's compliance with existing regulations including applicable grading/erosion control requirements, stormwater runoff from the Project Site would be minimized and water quality standards would be preserved, thereby avoiding adverse effects to the existing stormwater drainage system.
HYD-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	PMM HYD-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	No mitigation applies. No mitigation is required, as the Project Site is not located in a 100-year flood hazard area according to the Los Angeles General Plan Safety Element. Additionally, according to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel #06037C1617G, the Project Site is located within an Area of Minimal Flood Hazard. Furthermore, based on the ESA - Phase I, PEA, no wetlands were identified at the property or adjoining/ immediately surrounding properties and, therefore, the risk of flooding from a seismically induced seiche is remote. Thus, the Project would not place structures in an area that would impede or redirect flood flows. The Project Site has a very low potential for inundation by seiche, tsunami, or mudflow. Based on the ESA - Phase I, PEA, no wetlands were identified at the Project Site or adjoining/immediately surrounding properties (Attachment D). The Project Site is located approximately 11 miles away from the Pacific Ocean, with no nearby major waterbodies. Therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. In addition, the Project Site is located in an urbanized portion of the City and is relatively flat, which limits the potential for inundation

		by mudflow. Thus, the potential for inundation by seiche, tsunami, or mudflow is considered low.
HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	<u>PMM HYD-2.</u> See above.	As discussed under HYD-2 , the Project would substantially conform with this mitigation measure because it will comply with existing regulations regarding potential dewatering as well as low-impact development requirements. Compliance with these regulatory requirements would avoid potential conflict or obstruction of water quality control plans or sustainable groundwater management plans that are within the jurisdiction and authority of the SWRCB, LARWQCB, Water Districts, and other groundwater management agencies.
Land Use and Planning (LU)		
LU-1: Potential to physically divide an established community.	PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: — Selecting alignments within or adjacent to existing public rights of way. — Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. — Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: — Alignment shifts to minimize the area affected.	No mitigation applies. The Project does not contain features or new infrastructure that would cause a permanent disruption in the physical arrangement of the established community. Nevertheless, the Project would include pedestrian improvements, which would facilitate good design to improve existing pedestrian connections.

	— Reduction of the proposed right-of-way take to minimize the overall area of impact. — Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	
LU-2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.	No mitigation applies. No mitigation is required, as the Project is consistent with applicable regional and local land use plans, policies, and regulations, as described below. As set forth in this exemption document, the Project is consistent with the general use designation, density, building intensity, and applicable policies of SCAG's 2016 and 2020 RTP/SCS (see PRC Section 21155(a) consistency determination and Attachment B). Moreover, as discussed under POP-1, the Project is consistent with the growth projections contained in the RTP/SCS. Accordingly, the Project does not conflict with the RTP/SCS. In addition, the Project is consistent with applicable policies in the Los Angeles General Plan, including Framework Element Objective 3.13 regarding the development of mixed-use multi-family residential developments along corridors that are well-served by transit. The Project's 137 units would be constructed in walking distance of the Metro B Line Hollywood/Highland Station, which will support Objective 2.2 of the General Plan's Housing Element by developing mixed-income housing and amenities near transit. The Project Site is also subject to the 1988 Hollywood Community Plan, and the Project is consistent with its land use designation of Regional Center Commercial as well as the existing zoning designation (CR-2D), which allows for residential and commercial uses. Moreover, as a transit-oriented housing project, the Project is consistent with the Hollywood Community Plan's goals and objectives regarding the provision of housing to satisfy the needs of all economic segments of the community (Objective 3), to enhance the residential character of the community (Objective 3), and to encourage the expansion and improvement of public transportation (Objective 6) by intensifying the development intensity of a transit-proximate

		infill location and therefore attracting more residents and commercial patrons who may utilize transit options. Additionally, the Project's proposed density, floor area, and development envelope are consistent with the City's Transit Oriented Communities Affordable Housing Incentive Guidelines (TOC Program), which permits density increases and associated incentives in conjunction with the provision of affordable housing. Therefore, the Project would substantially conform with applicable regional and local land use plans, policies, and regulations, and, thus, no mitigation applies.
Mineral Resources (MIN)		
MIN-1: Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.	PMM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.	No mitigation applies. The Project Site is fully developed, and no oil wells are present.²¹ There are no oil extraction operations or drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses. Therefore, this mitigation measure does not apply.

21 California Environmental, 2020. Environmental Site Assessment – Phase I, Preliminary Endangerment Assessment (PEA) Report Format. May 2020.

	3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
MIN-2: Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.	<u>PMM MIN-1</u> . See above.	No mitigation applies. There are no oil extraction operations or drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses (Attachment D). ²² Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, this mitigation measure does not apply
Noise (NOISE)		
NOISE-1: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	PMM NOISE-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in	The Project will substantially conform to this mitigation measure through required compliance with applicable City construction noise regulations as well as incorporation of measures as set forth in PM-NOI-1 intended to reduce increases in existing ambient noise levels resulting from the Project's construction activities, consistent with the measures identified in PMM NOISE-1: PM-NOI-1: Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through

²² California Environmental, 2020. Environmental Site Assessment – Phase I, Preliminary Endangerment Assessment (PEA) Report Format. May 2020.

	the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive	Friday, and 8:00 AM to 6:00 PM on Saturday, pursuant to LAMC Section 41.40. • The Project shall comply with LAMC Section 112.05(a), which institutes a maximum noise limit from powered construction equipment of 75 dBA at 50 feet of distance. • Construction staging areas for the Project Site shall be as far from sensitive receptors as possible. • Temporary sound barriers, capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound wall or sound blankets), and capable of blocking the line-of-sight between the adjacent sensitive receptors, shall be installed. • All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5
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	receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses; n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent	dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors. • Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors. Through required compliance with regulatory requirements as well as implementation of the identified Project measure, the Project will be in substantial conformance with this mitigation measure.
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	buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible. y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.	
NOISE-2: Generation of excessive groundborne vibration or groundborne noise levels.	<u>PMM NOISE-1.</u> See above. PMM NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the	See above for discussion of consistency with PMM NOISE-1. The Project substantially conforms to PMM NOISE-2 due to its required compliance with existing regulations, including LAMC Section 91.3307.1, which requires adjoining public and private property to be protected from damage during construction, remodeling and demolition work. In addition, as described above under CULT-2, the Project will implement Project Measure PM-CULT-1 to ensure no damage occurs to adjacent historical resources. With compliance with existing regulatory requirements as well as

	structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	implementation of this Project Measure, the Project would substantially conform with PMM NOISE-2.
NOISE-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.	No mitigation required.	No mitigation applies.
Population and Housing (POP)		

POP-1: Induce substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure)	No mitigation required.	No mitigation applies. As discussed above under LU-1 and LU-2, no mitigation applies as the Project is consistent with the goals and policies of regional and local plans, and does not propose features or new infrastructure that would disrupt the physical arrangement of the established community or induce new growth in the vicinity of the Project Site. Accordingly, the Project's use and development envelope are consistent with SCAG's 2020-2045 RTP/SCS, the Los Angeles General Plan, the City's zoning code, and City TOC program. In addition, the projected population increase at the Project Site would be consistent with SCAG's population projections for the City. Specifically, the Project's addition of 330 residents represents a 0.0084 percent increase in resident population estimates for the City in 2016 and 0.0069 percent of the estimated population in the City by 2045.^{23,24} This increase would not be considered a substantial increase in population for the area and is within the anticipated SCAG forecast for population. As such, population growth associated with the proposed Project would be minimal and no mitigation applies. These 137 residential units would represent a 0.0100 percent increase in the overall estimated housing units for the City in 2016 and 0.0076 percent of the estimated housing units for the City by 2045.²⁵ This increase would not be considered a substantial increase in housing for the area as the addition of 137 new multi-family residential units is within the anticipated housing increases based on SCAG projections for housing. As such, housing growth associated
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23 The latest Citywide average household size is 2.41 residents per housing unit, based on 2018 Census American Community Survey 5-Year Estimate data, <https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2018/5-year.html> , accessed September 17, 2020.

2.41 persons/housing unit x 137 units = 330 residents

24 Population Year 2016: (330 residents/3,933,800 total City of LA residents) x 100 = 0.0084 %

Population Year 2045: (330 residents/4,771,300 total projected City of LA residents) x 100 = 0.0069 %

25 Housing Year 2016: (137 units/1,367,000 total City of LA units) x 100 = 0.0100%

Housing Year 2045: (137 units/1,793,000 total projected City of LA units) x 100 = 0.0076 %

		with the proposed Project would be minimal and no mitigation applies. Due to its consistency with these regional and local plans and policies, the Project would not induce significant growth or accelerate development in an undeveloped area that exceeds projected/planned levels. Furthermore, the Project would respond to the general need for more housing in the region, which would help accommodate the growth forecast for the City.
POP-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	PMM POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	No mitigation applies. This mitigation measure pertains to potential displacement effects associated with the acquisition of rights-of-way and subsequent construction of transportation projects and, therefore, is not applicable to the Project. Notwithstanding, the Project would not displace any existing housing, as it would replace an existing surface parking lot at the Project Site. Furthermore, the Project would develop 137 new housing units at the Project Site, including 14 affordable housing units. Accordingly, development of the Project would not necessitate the construction of replacement housing and this mitigation does not apply.
Fire Services		
PSF-1: Result in substantial adverse physical impacts associated with the	<u>PMM PSP-1.</u> See below.	The Project already substantially conforms with PMM PSP-1 through its required compliance with existing regulatory requirements. The LAFD considers fire protection services for a project adequate if the project is within the

provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.		maximum response distance for the type of land use proposed. LAMC Section 57.507.3.3 states the maximum response distances for highly intensive industrial and commercial land uses is 1 mile for an engine company and 1.5 miles for a truck company, while the maximum response distances for high-density residential and commercial neighborhood land uses such as the Project are 1.5 miles for an engine company and 2 miles for a truck company. If these distances are exceeded, all new structures would be required to install automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Code (e.g., fire signaling systems, fire extinguishers, smoker removal systems, etc.). With such systems installed, fire protection would be considered adequate even if the Project is located beyond the maximum response distance. The proposed Project is located approximately 0.8 miles northeast of LAFD Station 41, which is equipped with an engine company, and approximately 0.65 miles northwest of LAFD Station 27, which is equipped with a truck company. The Project Site therefore meets the distance requirements of Section 57.507.3.3, even for the highly intensive land use category of industrial/commercial. However, a final determination regarding response distances would be made by the LAFD during the Project's plan check process, and if LAFD determines the Project is outside of the maximum response distance for both an engine and a truck company, the Project would be required to install automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Code. The Project would also be required to demonstrate compliance with Fire Code requirements as part of LAFD's hydrant and access plan check review as well as LAFD's fire and life safety plan review and inspection for new construction projects, as set forth in LAMC Section 57.118. Accordingly, the Project's compliance with all State and City regulatory requirements and guidelines that address fire protection services will be equal to or more effective than PMM PSP-1, which thus ensures consistency with the mitigation measure.
Police Services (PSP)		

PSP-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.	The Project would substantially conform to this mitigation measure through incorporation of measures that comply with the City's public safety policies, as set forth in Project Measure PM-PSP-1, below. These measures include implementation of on-site security features, coordination with the Los Angeles Police Department (LAPD), and incorporation of crime prevention features such as fencing of construction sites. PM-PSP-1: • During construction, the Project Site shall be secured with a temporary, 6-foot-high, commercial grade, chain-link construction fences to protect construction zones on the Project Site. • The Project Applicant shall provide for the deployment of a private security guard to monitor and patrol the Project Site during off hours, appropriate to the phase of construction throughout the construction period. The Project Applicant shall provide adequate lighting around the building in order to improve security. • The Project Applicant shall design the Project Site's public and private recreational facilities in order to ensure a high visibility of these areas, including the provision of adequate lighting for security. • The Project Applicant shall provide the LAPD with the opportunity to review Project plans at the plan check stage of plan approval and shall incorporate any reasonable LAPD recommendations. • The Project Applicant shall provide the LAPD with a diagram of the Project Site, showing access routes and additional access information as requested by the LAPD, to facilitate police response. Compliance with all State and City regulatory requirements and guidelines that address police protection as well as the measures under Project Measure PM-PSP-1 will be equal to or more effective than PMM PSP-1 and, thus, ensure consistency to this mitigation measure.
Schools (PSS)		

PSS-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	The Project would substantially conform with this mitigation measure due to its compliance with existing regulatory requirements. Specifically, payment of required school fees to LAUSD is required by law, and is considered full mitigation of all impacts to schools pursuant to SB 50 and California Government Code Section 65995. Therefore, pursuant to existing regulatory requirements the Project would substantially conform with this mitigation measure.
Library Services (PSL)		
PSL-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	PMM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.	No mitigation applies. This mitigation does not apply to the Project, as the Project does not propose to construct new or altered library facilities, and the Los Angeles Public Library has no current plans to construct any new libraries in the vicinity of the project Site. Therefore, no adverse effects from library construction would result from Project implementation and this mitigation does not apply.
Recreation (REC)		
REC-1: Potential to increase the use of existing neighborhood	PMM REC-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation	The Project would substantially conform with this mitigation measure due to its compliance with existing regulatory requirements. Specifically, any potential impacts

and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing “green” development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards.	to City recreational facilities by Project residents would be minimized through compliance with LAMC Section 12.21 (G), pursuant to which the Project would include on-site open space, which would reduce demand placed on local parks and recreational facilities by Project residents. In addition, pursuant to LAMC Sections 12.33 and 21.10.3, the Project will be required to make payment of any required park fees and dwelling unit construction taxes to the City. Therefore, pursuant to existing regulatory requirements, the Project would not require the addition of a new park or require the alteration or addition to an existing park or open space facility, and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, the Project would substantially conform with this mitigation measure.
REC-2: Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service	<u>PMM REC-1, PMM AQ-2, and PMM NOISE-1.</u> See above.	As described above under REC-1, the Project would substantially conform with PMM REC-1 through required compliance with the City’s existing regulatory requirements pertaining to parkland and recreational facilities, including payment of required park fees. Furthermore, the Project would not require the construction or expansion of recreational facilities because any potential impacts to City recreational facilities by Project residents would be minimized through compliance with LAMC Section 12.21 G, pursuant to which the Project would include on-site open space, which would reduce demand placed on local parks and recreational facilities by Project residents, as well as compliance with the park fee requirements of LAMC Sections 12.33 and 21.10.3. Furthermore, because no new park facility construction or expansion is required, the

ratios, or other performance objectives. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.		mitigation measures under PMM AQ-2 and PMM NOISE-1 would not be applicable. Thus, the Project would substantially conform with these mitigation measures.
Transportation, Traffic, and Safety (TRA)		
TRA-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	No mitigation required.	No mitigation applies. Nevertheless, the Project would be developed at an infill site served by extensive transportation infrastructure, and during its construction, would implement a number of measures as described below under PMM TRA-1 to ensure that no conflicts with the circulation system would occur. Specifically, the Project is well served by local and regional transit and has access to alternative modes of transportation including public transit, bicycling, and walking. Transit in the Project Site vicinity include various routes operated by Metro, including six major bus routes along Highland Avenue, Hollywood Boulevard, Sunset Boulevard, and La Brea Avenue, within one-quarter mile of the Project Site. Furthermore, the Project Site is within walking or biking distance from Metro's Hollywood/Highland Red Line rail the Metro B Line Hollywood/Highland Station located approximately 290 feet north of the Project Site. In addition, Class III bicycle routes are provided along Orange Drive – south of Hollywood Boulevard, Selma Avenue – east of Highland Avenue, and Yucca Street – east of Highland Avenue. Future Class III bicycle routes that are planned for in the City of Los Angeles and in the vicinity of the Project Site, include: Hawthorn Avenue – west of Highland Avenue, Orange Drive – north of Hollywood Boulevard, Las Palmas Avenue – between Selma Avenue and Sunset Boulevard, and Franklin Avenue – east of Highland Avenue. Future Class II bicycle lanes that are planned for in the City of Los Angeles, and in the vicinity of the Project Site, include: Hollywood Boulevard, Highland

		Avenue, Franklin Avenue – west of Highland Avenue, and La Brea Avenue.²⁶ Furthermore, as demonstrated in the Transportation Assessment prepared for the Project (see Attachment I) and as approved by LADOT, the Project would not conflict with measures of effectiveness for the performance of the circulation system. Specifically, the Project would not conflict with or be inconsistent with applicable City transportation plans or policies, would not result in any impacts pertaining to VMT, and would not result in any increased hazards due to a geometric design feature. In addition, the Project would comply with applicable vehicular and bicycle parking requirements. During construction, the Project would be subject to PM-TRA-1, as described below, which requires the submittal of construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. Implementation of this construction plan would reduce potential construction-related conflicts with transit, bicycle, and pedestrian traffic in the vicinity of the Project Site. During operation, the Project would encourage the utilization of transit due to its close proximity to these bus lines and the Metro B Line station in the greater vicinity of the Project Site, and adjacent and nearby bicycle lanes. The redevelopment of the Project Site with new residential and neighborhood serving retail and restaurant uses will enhance the pedestrian environment along Hollywood Boulevard and encourage additional foot traffic along this corridor. The Project would also include bicycle parking for its residents and patrons of its commercial uses in compliance with LAMC requirements, further facilitating non-vehicular forms of travel to and from the Project Site. PM-TRA-1: Prior to the issuance of a demolition, grading or building permit, a detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans, will be
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²⁶ City of Los Angeles, Department of Public Works. 2020. LA County Bikeways Map. Available at: <https://dpw.lacounty.gov/pdd/bike/map.cfm>, accessed on May 31, 2020.

		prepared and submitted to the City for review and approval. The Construction Traffic Management Plan will formalize how construction would be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Traffic Management Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and will include, but not be limited to, the following elements as appropriate: • 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); • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets; • Prohibiting hauling during peak hours; • Rerouting construction trucks to reduce travel on congested streets; • Prohibiting construction-related vehicles from parking on surrounding public streets; • Providing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers; • Accommodating all equipment on-site; • Scheduling of construction-related deliveries to reduce travel during commuter peak hours; and • Obtaining the required permits for truck haul routes from the City prior to issuance of any permit for the Project. Thus, through the Project's conformance with the transit-oriented policies of regional and local plans as well as incorporation of Project Measure PM-TRA-1, construction and operation of the Project would not result in adverse effects to the performance of the circulation system.
TRA-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3(b).	PMM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	The Project would substantially conform with the relevant portions of this mitigation measure. A number of the identified measures would pertain to the City or a regional transportation agency, and are therefore not relevant to the Project. Of the project-level measures, the Project already substantially conforms with the identified measures, as it is a TPP and is also located within a TPA with access to

	• Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: — include TDM mitigation requirements for new developments; — incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; — provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; — implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; — develop TDM-specific performance measures to evaluate project-specific and system-wide performance; — incorporate TDM performance measures in the decision-making process for identifying transportation investments; — implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and — set aside funding for TDM initiatives. — The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.	alternative modes of transportation, including public transit, bicycling, and walking. Pursuant to CEQA Guidelines Section 15064.3(b)(1), development projects within one-half mile of a major transit stop shall generally be presumed to have a less than significant impact pertaining to VMT. Notwithstanding this presumption, the Project will also directly encourage the utilization of transit due to its close proximity to the Hollywood/Highland Los Angeles Metro B Line Station and the other local bus lines in the area as discussed in the SCPE. Furthermore, as demonstrated in the Transportation Assessment prepared for the Project (see Attachment I), the Project would not result in any impacts pertaining to VMT. In addition, pursuant to Project Measure PM-TRA-1, the Project will implement a detailed Construction Traffic Management Plan to reduce potential congestion and conflicts during the construction phase of the Project. Accordingly, the Project would substantially conform with this mitigation measure.
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TRA-3: Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	No mitigation required.	No mitigation applies.
TRA-4: Result in inadequate emergency access.	PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: — Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. — Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. — Scheduling of truck trips outside of peak morning and evening commute hours. — Limiting of lane closures during peak hours to the extent possible.	The identified measures under PMM TRA-2 would primarily pertain to the City or a regional transportation or emergency management agency, and are therefore not applicable to the Project. Notwithstanding, the Project substantially conforms with those measures that could be applicable to a private development project, as the Project would implement Project Measure PM-TRA-1 as described above, which requires the preparation and City approval of a Construction Traffic Management Plan, which would be implemented during Project construction to reduce and avoid potential impacts regarding emergency access. In addition, as described under consistency for PMM PSF-1 and PMM PSP-1, the Project will undergo review by the LAFD and LAPD regarding site access and emergency response. Furthermore, as demonstrated in the Transportation Assessment prepared for the Project (see Attachment I), the Project would not conflict with measures of effectiveness for the performance of the circulation system and would not result in any increased hazards due to a geometric design feature. Through implementation of these measures, the Project would substantially conform with PMM TRA-2.

	— Usage of haul routes minimizing truck traffic on local roadways to the extent possible. — Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. — Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. — Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. — Storage of construction materials only in designated areas. — Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. — Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. — Enhance emergency preparedness awareness among public agencies and with the public at large.	
Tribal Cultural Resources		
TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource	<u>PMM CULT-1</u> . See above.	No mitigation applies. The Project is located within a highly developed urban area on a previously disturbed site and the potential for discovery of archaeological or tribal cultural resources is therefore considered low. Nonetheless, to ensure Project consistency with PMM CULT-1, the Project

defined in Public Resources Code section 21074 that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.		would implement the relevant provisions of PMM CULT-1 pertaining to archaeological and tribal cultural resources, as described above under CULT-2. The City has determined that these PMs are equal to or more effective than PMM CULT-1 regarding archaeological and tribal cultural resources.
Solid Waste		
USSW-1: Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. USSW-2: Comply with federal, state, and local management and reduction statutes and	PMM USSW-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following: a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.	The Project would substantially conform with this mitigation measure through compliance with existing regulations. Specifically, at the State level, the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) seeks to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000. Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (CoIWMP), pursuant to which landfill disposal needs and capacity are continually evaluated as part of the preparation of the CoIWMP Annual

regulations related to solid waste.	b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.	Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent ColWMP 2018 Annual Report for Los Angeles County states that no solid waste disposal capacity shortfall is anticipated within the next 15 years (i.e., until 2033) under current conditions.²⁷ The City's Solid Waste Management Policy Plan (CiSWMPP) is a long-range policy plan adopted in 1993 to provide direction for the solid waste management. The objective of the CiSWMPP is to promote source reduction or recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020. The CiSWMPP's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.²⁸ The City also adopted the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) in 2006, which has the primary objective of achieving a zero waste goal through reducing, reusing, recycling, or converting the resources currently going to disposal. The Project would be required to reduce the total estimated waste output through these established City recycling programs, and would also be subject to the City's Recycling Space Allocation Ordinance (Ordinance No. 171,687), which establishes requirements for the inclusion of recycling areas or rooms within development projects. In addition, in compliance with existing City standards and regulations, the Project would be required to recycle construction and demolition (C&D) waste to the maximum extent possible pursuant to Ordinance No. 181,51921 (Citywide Construction and Demolition Waste Recycling Ordinance) that requires all mixed C&D waste generated within City limits to be taken to City-certified C&D waste processors. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly. Overall, compliance with existing regulations
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27 County of Los Angeles Department of Public Works, ColWMP 2018 Annual Report, December 2019, page 37.

28 LASAN, Recycling, 2020. Available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=auguwdldg_5&_afLoop=10870014375826670#!, accessed July 7, 2020.

	j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	would ensure that the Project's waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving conformance with this mitigation measure.
Wastewater		
USWW-1: Require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects.	<u>PMM HYD-1.</u> See above. PMM USWW-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and	As described above under HYD-1 , the Project would substantially conform with this mitigation measure because the Project would adhere to all applicable controls imposed via existing City and State regulations, including compliance with the LID Ordinance and grading/erosion requirements. Runoff from the Project Site would be either directed in non-erosive drainage devices to landscaped areas for evaporation and/or directed to the existing City storm drain system, captured in on-site below grade cisterns, and/or directed to the existing City storm drain system. Therefore, through compliance with these existing regulatory requirements, the Project would not result in a significant increase in site runoff or significant changes in local drainage patterns, would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems, and would not require or result in construction of new storm water drainage facilities or expansion of existing facilities.

	utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	Furthermore, as discussed in the Utility Infrastructure Technical Report: Water, Wastewater, and Energy prepared by KPFF Consulting Engineers in July 2020, a Wastewater Services Information Request (WWSI) letter, that identifies the Project's estimated total flow was submitted to the City's Bureau of Sanitation (LASAN) to verify capacity availability. Based on the approved WWSI, LASAN has confirmed that there is sufficient capacity to service the Project (Attachment C). LASAN's review considers the Project demands on the infrastructure in conjunction with existing conditions and forecasted growth. In addition, the City's Integrated Resources Plan addresses the facility needs of the City's wastewater program, recycled water, and urban runoff/stormwater management through the year 2020, and for the next planning horizon, the City has developed the One Water Los Angeles 2040 Plan. As it relates to wastewater, the One Water LA 2040 Plan includes a Wastewater Facilities Plan, which would guide LASAN decisions on implementing system improvements to its wastewater collection and treatment facilities. The One Water LA 2040 Plan concludes that based on the design capacities and the projected future flows of each water reclamation plant within the City through year 2040, all existing water reclamation plants would have sufficient capacity to manage projected wastewater flows. As such, the Project as well as other projects within the City could be served by the existing sewer infrastructure. As previously described, LASAN also manages the City's storm drain infrastructure. In terms of stormwater runoff, the Project would be expected to decrease the amount of runoff that would flow to nearby storm drains due to inclusion of LID BMPs to capture some of the stormwater. In addition, per City requirements, the Project would be required to comply with the Los Angeles County Department of Public Works Hydrology Manual and the City's LID Ordinance to treat stormwater for pollutants and control runoff at buildout Thus, the Project would substantially conform with this mitigation.
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USWW-2: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	<u>PMM USWW-1. See above.</u>	The Project would substantially conform to this mitigation measure as described above for USWW-1.
Water Supply		
USWS-1: Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.	PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.	The Project would substantially conform with this mitigation measure through compliance with existing regulations as well as consistency with current regional population projections. Specifically, as described above under POP-1, the projected population increase at the Project Site would be consistent with SCAG's population projections for the City. Specifically, the addition of 330 residents represents a 0.0084 percent increase in resident population estimates for the City in 2016, and 0.0069 percent of the estimated population in the City by 2045.^{29,30} This increase would not be considered a substantial increase in population for the area and is within the anticipated SCAG forecast for population.³¹ These 137 residential units would represent a 0.0100 percent increase in the overall estimated housing units for the City in 2016 and 0.0076 percent of the estimated housing

29 The latest Citywide average household size is 2.41 residents per housing unit, based on 2018 Census American Community Survey 5-Year Estimate data (2009–2018), <https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2018/5-year.html>, accessed September 17, 2020.

2.41 persons/housing unit x 137 units = 330 residents

30 Population Year 2016: (330 residents/3,933,800 total City of LA residents) x 100 = 0.0084%

Population Year 2045: (330 residents/4,771,300 total projected City of LA residents) x 100 = 0.0069%

31 SCAG Connect SoCal, Demographics and Growth Forecast Technical Report as adopted on May 7, 2020, Table 14 Jurisdiction-Level Growth Forecast. Available at: https://www.connectsocial.org/Documents/Adopted/fConnectSoCal_Demographics-And-Growth-Forecast.pdf, accessed on September 2020.

	c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.	units for the City by 2045.³² This increase would not be considered a substantial increase in population for the area and is within the anticipated SCAG forecast for population.³³ Due to its consistency with these regional and local plans and policies, the Project would not induce significant growth or accelerate development in an undeveloped area that exceeds projected/planned levels. In addition, LADWP is responsible for long-term planning regarding the sufficiency of water supplies under its jurisdiction. LADWP's 2015 Urban Water Management Plan, which accounts for existing development within the City as well as projected growth, is consistent with SCAG's population projections for the region and accounts for existing and projected populations in their determination that there would be sufficient water to supply regional demand.³⁴ Therefore, since the Project would be consistent with SCAG projections for population and housing, the Project would be accounted for in the UWMP's water demand estimates. In addition, to ensure that water demand is reduced to the extent feasible, the Project would be required to comply with City Ordinance No. 170,978 (Landscape Ordinance), which imposes numerous water conservation measures in landscaping, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). Moreover, as described under ENR-2, as a TPP project seeking a CEQA exemption pursuant to SB 375, the Project would be required to design building and landscaping to achieve 25 percent less water usage than the average
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32 Housing Year 2016: (137 units/1,367,000 total City of LA units) x 100 = 0.0100%

Housing Year 2045: (137 units/1,793,000 total projected City of LA units) x 100 = 0.0076%

33 SCAG Connect SoCal, Demographics and Growth Forecast Technical Report as adopted on May 7, 2020, Table 14 Jurisdiction-Level Growth Forecast. Available at: https://www.connectsocal.org/Documents/Adopted/fConnectSoCal_Demographics-And-Growth-Forecast.pdf, accessed September 2020.

34 City of Los Angeles Department of Water and Power, 2015 Urban Water Management Plan. June 2016.

		household in the region as part of the CEQA exemption process. As demonstrated in the CEQA Energy and Water Efficiency Compliance Technical Report prepared for the Project (Attachment G), the Project's water use would be 64.8 percent below the regional baseline, which would be achieved through multiple measures including high efficiency water-using appliances such as low flow fixtures and faucets, and efficient irrigation systems in compliance with the Los Angeles Green Building Code. Thus, it is reasonably anticipated that the Project would not create any water system capacity issues, and sufficient reliable water supplies would be available to meet Project demands. Through regulatory compliance, the Project would substantially conform with this mitigation measure.
USWS-2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	<u>PMM USWS-1.</u> See above.	The Project would substantially conform to this mitigation measure as described above for USWS-1 .
Wildfire		
WF-1: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related	No mitigation applies. As recognized in the 2020-2045 RTP/SCS, the Project Site is located in a highly urbanized area of the City. The Project Site is not located within a Very High Fire Hazard Severity Zone pursuant to the City's ZIMAS system, nor is it located within a designated Fire Buffer Zone or Mountain Fire District by the 1996 City General Plan's Safety Element.^{35,36} Therefore, this mitigation measure would not apply.

35 City of Los Angeles, ZIMAS, 2020. Parcel information for 6831 Hawthorn Avenue, APN 5548006002. Available at: <http://zimas.lacity.org/>, accessed September 17, 2020.

36 City of Los Angeles, Department of City Planning, 1996. City of Los Angeles General Plan, Safety Element. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed September 17, 2020.

	procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place	
WF-2: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.	<u>PMM HAZ-4.</u> See above. PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to — Submit a fire protection plan including the designation of fire watch staff; — Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;	The Project would substantially conform with PMM HAZ-4 as described above for HAZ-4. Furthermore, as recognized in the 2020-2045 RTP/SCS, the Project Site is located in a highly urbanized area of the City. The Project Site is not located within a Very High Fire Hazard Severity Zone pursuant to the City's ZIMAS system, nor is it located within a designated Fire Buffer Zone or Mountain Fire District by the 1996 City General Plan's Safety Element.^{37,38} Therefore, this mitigation measure would not apply.

37 City of Los Angeles, ZIMAS, 2020. Parcel information for 6831 Hawthorn Avenue, APN 5548006002. Available at: <http://zimas.lacity.org/>, accessed September 17, 2020.

38 City of Los Angeles, Department of City Planning, 1996. City of Los Angeles General Plan, Safety Element. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed September 17, 2020.

	— Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and — Designate trained fire watch staff during project construction to reduce risk of fire hazards.	
WF-3: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.	<u>PMM WF-1, PMM WF-2, PMM HYD-1, and PMM HAZ-4.</u> See above.	The Project would be in substantial conformance with these mitigation measures as described above for HAZ-4, HYD-1, WF-1, and WF-2.