CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012
Sustainable Communities
Project CEQA Exemption

Echo Park – Taix Square Project

Environmental Case Number: ENV-2020-3141-SCPE
Related Case Number: CPC-2020-3140-CU-MCUP-DB-SPR-HCA

Project Location: 1911-1931 W. Sunset Boulevard, 1910-2018 W. Reservoir Street, Los Angeles, CA 90026

Community Plan Area: Silver Lake – Echo Park – Elysian Valley Community Plan Area

Council District: 13 – Mitch O-Farrell

Project Description: The project is the removal of an existing medical office building, restaurant building (Taix French Restaurant), and surface parking lot for the development of a 6-story (67-foot) mixed-use residential building with a total of 166 residential units (9 studio, 120 one-bedroom, 33 two-bedroom units, and 4 three-bedroom units) and 13,000 square feet of commercial uses. The Project will set aside 24 units for Very-Low Income Households. Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following: 1) Pursuant to LAMC Section 12.22.A.25(g)(3), the following six (6) Off-Menu Density Bonus waivers or modifications of development standards: a) to increase permissible FAR to 3.75:1 in lieu of the 1.5:1 FAR otherwise permitted; b) to permit residential parking at a ratio of 0.5 spaces per dwelling unit; c) to utilize any or all RAS3 yard requirements; d) to reduce the otherwise required open space by 25%; e) to allow 6 stories, in lieu of the 3 stories that applies to commercial and mixed-use buildings in the 1VL Height District., and f) to allow an additional 22 feet in height over the otherwise permitted 45 feet; 2) Pursuant LAMC Section 12.24 U.26, approval of a Conditional Use Permit to increase the density bonus greater than the maximum permitted in Section 12.22 A 25 (The Applicant seeks a density bonus increase of 51% to permit 166 dwelling units in lieu of 110 dwelling units allowed based on the Project site's base density; 3) Pursuant to LAMC Section 16.05, the Applicant requests Site Plan Review for a development project that creates more than 50 dwelling units, and 4) Pursuant to LAMC Section 12.24.W.1, the Applicant requests approval of a Master Conditional Use Permit for the sale or dispensing of a full line of alcoholic beverages for on- and off-site consumption only within up to five (5) premises.

PREPARED FOR:
City of Los Angeles
Department of City
Planning

PREPARED BY:
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February 2022

Table of Contents

Sustainable Communities Project CEQA Exemption

Section 1
Project Description

This section is based on the following item, which are included as **Appendix A** to this SCPE:

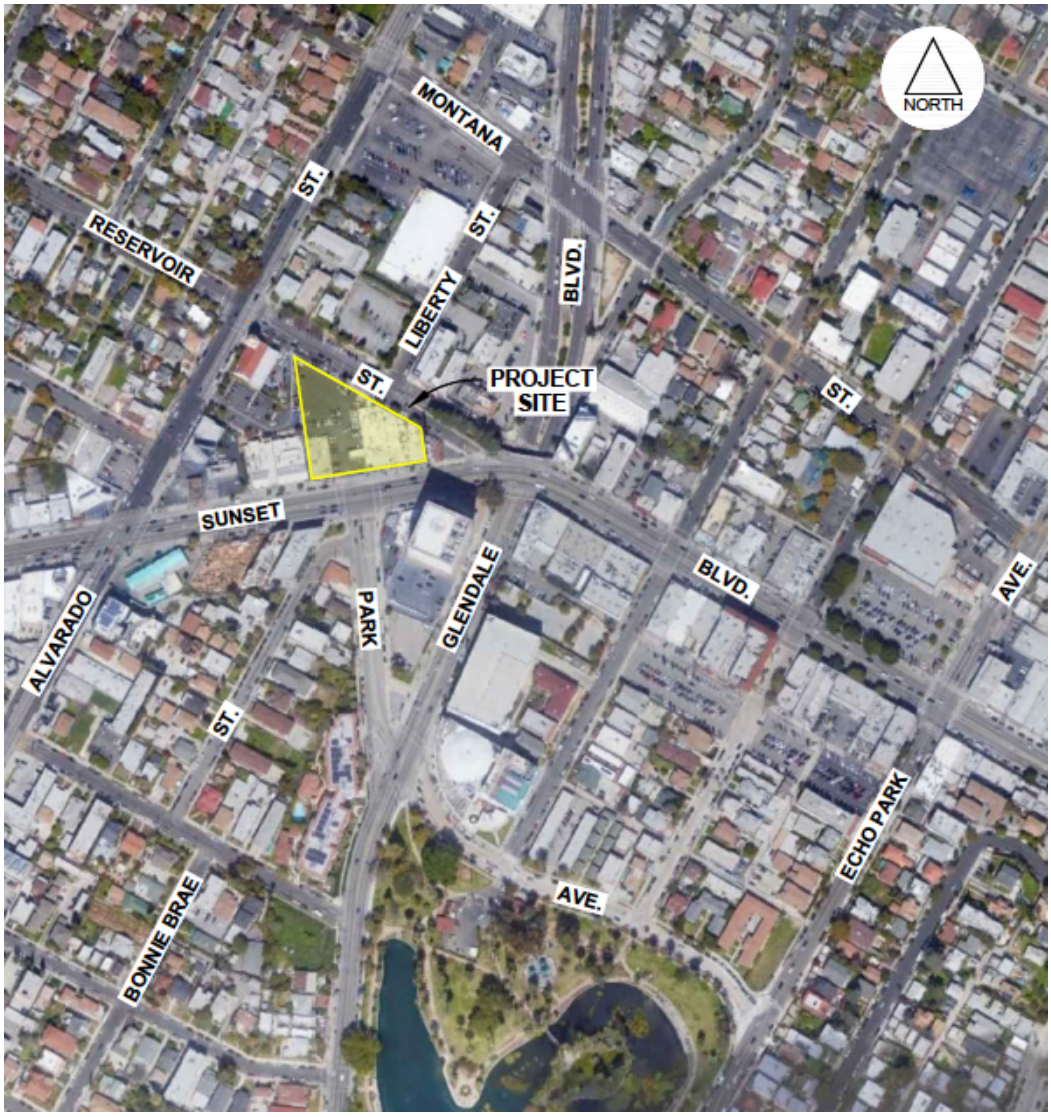
A Plans, Togawa Smith Martin, Inc., October 1, 2020.

1.1 Environmental Setting

1.1.1 Project Location

The Project Site is located on the north side of Sunset Boulevard and the south side of Reservoir Street, in the City of Los Angeles (City), in the County of Los Angeles (County). The Site is approximately 1.5 miles north of the Downtown Los Angeles and approximately 14 miles east of the Pacific Ocean. The Site is located within the Silver Lake – Echo Park – Elysian Valley Community Plan (Community Plan) area of the City.

See **Figure 1, Aerial Map**, for an aerial view of the Site and the immediate surrounding area.



1.1.2 Regional and Local Access

Regional access is provided by:

- US-101 (Hollywood) Freeway, located 2,600 feet south of the Site

Local access is provided by:

- Sunset Boulevard (Avenue I in Mobility Plan 2035)
- Reservoir Street (Local Street Standard in Mobility Plan 2035)
- Park Avenue (Local Street Standard in Mobility Plan 2035)
- Glendale Boulevard (Boulevard II in Mobility Plan 2035)

1.1.3 Surrounding Land Uses

To the north, across Reservoir Street, and west of Liberty Street is a 2-story multi-family residential building (2019 Reservoir Street) and a surface parking lot. This area is zoned R4-1L. To the north, across Reservoir Street and east of Liberty Street is a 2-story church (1310 Liberty) and a 1-story Burger King restaurant (1301 Glendale Boulevard). This area is zoned [Q]C2-1VL.

To the south, across Sunset Boulevard and south of Park Avenue is an 8-story Citibank office building (1153 Glendale Boulevard), and a 1-story Brite Spot restaurant (1918 Sunset Boulevard). The area is zoned C2-1L-CDO. Across Sunset Boulevard and north of Park Avenue is a 3-story multi-family building (2002 Sunset Boulevard). This area is zoned C2-2D.

Abutting the Site to the west is a 1-story Edendale Branch Public Library (2011 Sunset Boulevard) and associated surface parking lot. This area is zoned PF-1VL.

Abutting the Site to the east is a 1-story Baby Blues BBQ restaurant (1901 Sunset) Boulevard. This area is zoned [Q]C2-1VL.

1.1.4 Bicycle Facilities

Sunset Boulevard has a dedicated bike lane.

1.1.5 Pedestrian Facilities

There are sidewalks along the Project Site's boundaries on Sunset Boulevard and Reservoir Street. Striped crosswalks are provided at all legs of the nearest signalized intersection (Sunset Boulevard and Park Avenue).

1.1.6 Public Transit

The Site is within a High Quality Transit Area (HQTA)[1], which reflect areas with rail transit service

[1] http://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0

or bus service where lines have peak headways of less than 15 minutes.

The Los Angeles County Metropolitan Transit Agency (Metro) operates public transit in the area.[2]

- The intersection of Sunset Boulevard and Park Avenue, abutting the Project Site, provides access to the following bus lines:
    - Metro Local bus lines 2/302 and 4 run east-west along Sunset Boulevard.
- The intersection of Sunset Boulevard and Alvarado Street, located 450 feet west of the Site, provides access to the following bus lines:
    - Metro Local 2/302, 4, and Rapid 704 run east-west along Sunset Boulevard.
    - Metro Local 200 and 603 run north-south along Alvarado Street.
- The intersection of Park Avenue and Glendale Boulevard, located 565 feet south of the Site, provides access to the following bus line:
    - Metro Local bus line 92 runs north-south along Glendale Boulevard.

1.1.7 Planning and Zoning

Table 1-1, Project Site, lists the Site's APNs, zoning and land use designation. The Project Site lot area is approximately 43,896 square feet[3] (or 1.008 acres). The existing land use designation for the Project Site is Community Commercial. The Project Site is zoned C2-1VL and [Q]C2-1VL.

The [Q] condition for the Sunset Property (Ordinance 176,825) prohibits certain automotive and recycling uses as well as drive-through windows. It also requires that all new structures be built to the front property line, and vehicular access be taken from the side or the rear of the lot. A break in the building wall may be permitted to allow for driveways and other vehicular access when vehicular access cannot be obtained from the side or rear, as determined by the Department of Transportation. Buildings may be setback when the setback area is used for landscaping, plazas, courtyards, outdoor dining or other publicly accessible, open space uses. Parking must be located to the rear of the lot or underground.

The Project Site is subject to Zoning Information (ZI):

- ZI-2452 Transit Priority Area in the City of Los Angeles
- ZI-2374 Los Angeles State Enterprise Zone

2 Metro Westside map: https://media.metro.net/riding_metro/maps/images/CentLAWestsd.pdf

3 Plans, Togawa Smith Martin, Inc., October 1, 2020.

Table 1-1
Project Site

Address	APN	Size (sf)	Zone	Land Use
1911 W. Sunset Blvd., 1910 W. Reservoir Street	5404-001-034	4,737.8	[Q]C2-1VL	Community Commercial
1915 W. Sunset Blvd., 1918 W. Reservoir Street	5404-001-034	6,755.5		
1921 W. Sunset Boulevard	5404-001-034	7,010.8		
1925, 1927, 1929 W. Sunset Boulevard	5404-001-007	6,999.9		
1931 W. Sunset Boulevard	5404-001-008	6,789.9		
2000 W. Reservoir Street	5404-001-034	1,762.3	C2-1VL	
2008, 2010 W. Reservoir Street	5404-001-034	3,790.5		
2016, 2018 W. Reservoir Street	5404-001-034	5,806.1		
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org, June 2021.				

1.1.8 Existing Conditions

The Project Site is currently developed with a 1-story, approximately 18,000 square-foot restaurant (Taix French Restaurant), a 1-story, 4,085 square foot medical office building, and associated surface parking lot.

There are 14 street trees (4 on Sunset Boulevard, 10 on Reservoir Street) around the Project Site and none onsite. None of the trees are protected.[4] The trees will be within the construction site and impact the ability to build the building to the property line as planned. Any tree removal will comply with the City's Tree Replacement Program (Urban Forestry Division, Bureau of Street Services for the street tree).

1.2 Project Description

1.2.1 Project Overview

The existing medical office building, restaurant building (Taix French Restaurant), and the surface parking lot will be removed. The Site will be developed with a 6-story (67-foot) mixed-use building with a total of 166 residential units (9 studio, 120 one-bedroom, 33 two-bedroom units, and 4 three-bedroom units) and 13,000 square feet of commercial uses. The Project will set aside 24 units for Very-Low Income Households.

A primary objective of the Project is to facilitate the continuation of the Taix French Restaurant, which is a legacy business operated by the Taix family that is currently located at the Project site. The Taix family, which has continuously operated the Taix French Restaurant since its founding (first in downtown Los Angeles, and now at its present location since 1962) has determined that the existing Taix French Restaurant is no longer viable to operate in its current size and format. The Project will provide the Taix family with a new restaurant facility sized and formatted to meet their operating needs and objectives so that they can continue their legacy business. The Project will also incorporate the physical characteristics identified by the City Council conveying the historic significance of the restaurant as part of its January 26, 2022 resolution (CF-21-0119)

4 Street Tree Report, Arborgate Consulting, Inc., April 9, 2019.

designating the Taix French Restaurant legacy business as a Historic-Cultural Monument.[5]

Based on a base density of 110 units, 21.8% of base density (24 units) will be reserved for Very Low Income Households. Such set aside is equivalent to 14.5% of the Project's total number of units (166 units).

The Project would include two below grade parking levels (P2, P1) and six levels at and above grade (L1-L6). Level 1 would include retail spaces on Sunset Boulevard, parking, and residential service areas (lobby, gym, and mailroom). Levels 2 through 6 would contain residential units.

The Project is seeking Conditional Use and Density Bonus approvals to provide equivalent base and additional incentives for density, FAR, parking, height, yard, and open space.

1.2.2 Design and Architecture

See **Appendix A** for floor plans, elevations, sections, and renderings. The Project has been designed as an integrated single structure with articulation and variation created by the massing of individual components. Parking spaces within the building (subterranean and ground levels) and residential units located within the building have been integrated into the overall architectural theme of the Project. Overall variation in building appearance is created with the use of various materials (stucco, wood, metal, brick), balconies, windows of different widths, the landscaped ground floor, and the transition of the first floor parking and retail to upper levels residential.

1.2.3 Density

Pursuant to the City's General Plan and Los Angeles Municipal Code (LAMC), the maximum residential density within the C2 zone is one dwelling unit for every 400 square feet of lot area. With 43,896 square feet of lot area, the Project could provide 110 units.[6]

In accordance with California Government Code Section 65915, the Applicant proposes to utilize LAMC Section 12.22.A.25 and LAMC Section 12.24.U.26 to seek approval of a 51% density bonus. The Project proposes 166 total units in lieu of the otherwise maximum density limit of 110 dwelling units. Pursuant to LAMC Section 12.22.A.25, a project is entitled to up to a 35% density bonus in exchange for the Applicant setting aside a specific amount of units, in this case 14.5% of base density to be set aside for Very Low-Income households for a period of 55 years.

Pursuant to LAMC Section 12.24.U.26, the Applicant must provide an additional 1% set aside of Very Low-Income Units in order to receive an additional 2.5% density increase. Based on a total project containing 166 units, the Applicant proposes to set aside 21.8% of the base density of the Project site (24 units) as restricted affordable units at the Very Low-Income level.

1.2.4 Floor Area

The Project Site maintains a pre-dedicated lot area of approximately 43,896 square feet. Height District 1VL permits an FAR of 1.5:1 (approximately 65,844 square feet). Based on its proposed

5 Incorporated by reference. Council File 21-0119 for Case No. CHC-2020-5524-HCM. Including all related hearings, files, resolutions, transcripts, and documents submitted: https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-0119

6 43,896 / 400 = 110

Very Low Income set aside, the Project site qualifies for an FAR of 3.75:1. With approval of the requested Density Bonus entitlement, the Project would contain a maximum of approximately 164,610 square feet of floor area (3.75:1 FAR); comprised of approximately 13,000 square feet of commercial floor area and up to 151,610 square feet of residential floor area. The C2 zone defines Buildable Area to be the same as the lot area of the Project site.

1.2.5 Yards

Pursuant to LAMC Section 12.14.C.2, portions of buildings used for residential purposes in the C2 zone are required to comply with side and rear yard standards of the R4 zone. LAMC Section 12.11.C.2 and 3 provides the side and rear yard requirements for the R4 zone. Side yard requirements for buildings more than two stories in height in the R4 zone require a minimum 5 feet in width with an additional one foot of width for each additional story above the second story up to 16 feet in width.

The front yards are on Sunset Boulevard and Reservoir Street. The side yards are on the abutting west and abutting east sides of the Site. At six-stories in height, the Project would require 11-foot side yard setbacks. The Applicant is requesting to reduce the yard requirements to provide 5-foot setbacks within the two side yards in lieu of the otherwise required 11-foot setbacks.

1.2.6 Height

Height District 1VL permits a maximum height of 45 feet. Commercial and mixed-use buildings in Height District 1VL – but not residential only buildings – are limited to 3 stories. The Project proposes a 6-story mixed-use building that is 67 feet in height. To permit the proposed 6 stories within such maximum height, the Applicant is requesting a waiver pursuant to LAMC Section12.22.A.25(g)(3) of the 3-story limitation for mixed-use buildings.

1.2.7 Open Space

Table 1-2, Open Space, provides the amount of required and provided open space. Pursuant to LAMC Section 12.21.G., the Project would be required to provide 17,725 square feet of usable open space for the Project's 166 units (129 units with less than 3 habitable rooms, 33 units with 3 habitable rooms, 4 with more than three habitable rooms).

The Applicant proposes to provide 25% less open space (13,303 square feet), and is accordingly requesting a waiver pursuant to LAMC Section 12.22.A.25(g)(3).

This usable open area includes approximately 10,885 square feet of common exterior spaces (82%), approximately 250 square feet of private open space (2%), and approximately 2,168 square feet of indoor open space (16%).

Table 1-2
Open Space

Use	Quantity	Rate	Total (sf)
Required			
Studio	9 unit	100 sf / unit	900
One-bedroom	120 units	100 sf / unit	12,000
Two-bedroom	33 units	125 sf / unit	4,125
Three-bedroom	4 units	175 sf / unit	700
		Subtotal	**17,725**
		25% Reduction	(4,431)
		Adjusted Total Required	**13,294**
Provided			
		Indoor Amenity	2,168
		Roof Deck	4,928
		Private Balconies	250
		Paseo	5,957
		Total Provided	**13,303**
Plans, Togawa Smith Martin, Inc., October 1, 2020.			

1.2.8 Landscape

Table 1-3, Landscape Space and Trees, provides the amount of required and provided landscape space and trees. See **Appendix A** for the location of the green space and trees.

The Project is required to provide 25% of the exterior common open space provided to be landscaped (planted). There is 10,885 square feet of exterior common open space (paseo + roof decks). This requirement is 2,721 square feet of landscaped space. The Project would provide 2,782 square feet (1,0967 square feet on Level 1, 675 square feet on Level 6, and 1,040 square feet on Level 7.)

The Project would remove and replace 14 street trees per the City's Tree Replacement Program. The Project is required to provide 1 tree per 4 units, for a total of 42 trees onsite. The Project would meet this requirement by providing 42 trees.

Table 1-3
Landscape Space and Trees

Quantity	Rate	Required	Provided
Landscape Space			
10,885 sf Exterior Common Open Space	25%	2,721 sf	2,782 sf
Trees			
166 units	1 tree per 4 units	42	42
Plans, Togawa Smith Martin, Inc., October 1, 2020.			

1.2.9 Access and Circulation

The Site contains a curb cut on Sunset Boulevard and on Reservoir Street. The Reservoir Street curb cut would be removed and the Sunset Boulevard curb cut would accommodate the proposed driveway. Access would be provided via one driveway on Sunset Boulevard.

Internal circulation would provide access to each parking level.

Pedestrian access would be located in the front of the building on Sunset Boulevard.

1.2.10 Vehicle Parking

Table 1-4, Vehicle Parking, provides the amount of required and provided vehicle parking. The Project would be required to provide 263 residential parking spaces, pursuant to LAMC Section 12.21.A.4, and 26 commercial parking spaces that is consistent with the State Enterprise Zone parking requirements in LAMC Section 12.21.A.4.x which requires one parking space be provided for every 500 square feet of commercial floor area.

The Applicant is requesting a waiver of development standards not on the Density Bonus menu to provide residential parking for the Project to permit residential parking at a ratio of 0.5 parking spaces per dwelling unit. For 166 dwelling units, 0.5 parking spaces per dwelling unit would be a total of 83 parking spaces. The Applicant is proposing to provide 194 residential parking spaces. This would provide an additional 0.67 parking spaces per dwelling unit.

The Applicant proposes to provide a total of 220 parking spaces as follows: 194 residential parking spaces within the Project's ground level and two subterranean level parking structure, and 26 commercial parking spaces that meets Enterprise Zone requirements.

Table 1-4
Vehicle Parking

Use	Quantity	Rate	Total (spaces)		
			Required	Requested	Provided
Residential	9 studio	1 spaces / unit[1]	9		
	120 1-bedroom	1.5 spaces /unit	180		
	33 2-bedroom	2 spaces /unit	66		
	4 3-bedroom	2 spaces /unit	8		
	Total Residential		263	83	194
Commercial	13,000 sf	1 spaces / 500 sf[2]	26	26	26
		Total	**289**	**109**	**220**

Round down fractions up to 0.5.
[1] The Applicant is requesting a waiver of development standards not on the Density Bonus menu to provide residential parking for the Project to permit residential parking at a ratio of 0.5 parking spaces per dwelling unit.
[2] LAMC Section 12.21.A4(x)(3), State Enterprise Zone
Plans, Togawa Smith Martin, Inc., October 1, 2020.

According to LAMC Section 99.04.106.4.2, 30% of the total number of parking spaces provided, but in no case less than one space, shall be electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE).

According to Ordinance No. 186,485 and LAMC Section 99.04.106.4.4 (residential) and 99.05.106.5.3.6 (nonresidential), the number of electric vehicle charging station (EVCS) shall be 10% of the total number of parking spaces provided for all new multi-family residential and nonresidential buildings, respectively. Calculations for the required number of EVCS shall be rounded up to the nearest whole number.

The Project is required to provide 30% (66 spaces) of EVCS and EVSE spaces. The Project would provide 66 spaces.

1.2.11 Bicycle Parking

Table 1-5, Bicycle Parking, provides the amount of required and provided bicycle parking. Short-term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long-term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather.

The Project would be required to provide 134 bicycle parking spaces, which is consistent with the bicycle parking proposed.

Table 1-5
Bicycle Parking

Units	Short-Term			Long-Term		
	Rate	Required	Provided	Rate	Required	Provided
Residential						
1-25	1 space / 10 units	3	-	1 space / unit	25	-
26-100	1 space / 15 units	5	-	1 space / 1.5 units	50	-
101-166	1 space / 20 units	4	-	1 space / 2 units	33	-
Subtotal		**12**	**12**		**108**	**108**
Commercial						
13,000 sf	1 per 2,000 sf	7	7	1 per 2,000 sf	7	7
Total		**19**	**19**		**115**	**115**
Per LAMC Section 12.21 A.4.P.1 and LAMC Section 12.21 A.16 (a)(1)(i). Plans, Togawa Smith Martin, Inc., October 1, 2020.						

1.2.12 Lighting and Signage

New lighting would include building identification, commercial accent lighting, wayfinding, balcony lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security and will be specified with LED fixtures to illuminate all walking surfaces. Light fixtures would be shielded and directed towards the areas to be lit and away from adjacent light-sensitive land uses.

The Project would also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto specified sensitive uses, under the terms of the LAMC Section 93.0117(b).

The Project would provide exterior lighting consistent with the Citywide Design Guidelines and

section V, Urban Design of the Community Plan. All exterior lighting would be shielded to reduce glare and eliminate light being cast into the night sky and security lighting with be integrated into the architectural and landscape lighting system.

Building identification signage for the ground-level commercial use would be visible from Sunset Boulevard.

1.2.13 Site Security

The Project would incorporate security measures for the safety of its residents and visitors. During construction of the Project, the Project Site would be fenced and gated. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to residential areas; lighting of building entryways and plaza areas; staff training in safety and sound security policies; and possible video surveillance. The security program would include controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems.

1.2.14 Sustainability Features

In compliance with SCPE requirements, the Project would be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region.

The Project would comply with the 2020 Los Angeles Green Building Code (LAGBC, effective January 1, 2020)[7] and the 2019 California Green Building Standards Code (CalGreen, effective January 1, 2020).[8]

Further considerations regarding energy efficiency and sustainability include native plants and drip/subsurface irrigation systems, individual metering or sub metering for water use, leak detection systems, and provisions for electric vehicle charging.

The Project would emphasize energy and water conservation, which would be achieved through the use of energy-efficient heating, ventilation, and air conditioning (HVAC) and lighting systems, and ENERGY STAR appliances, and low-flow plumbing fixtures. The Applicant proposes that the Project would include pre-wiring for electric vehicle (EV) charging spaces for 20 percent of Project's parking capacity for future use. In addition, of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity would include installed chargers for immediate use by EV.

The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation would reduce vehicle miles traveled for residents and visitors.

7 City of Los Angeles Department of Building and Safety, Green Building, available at http://ladbs.org/forms-publications/forms/green-building, accessed on March 25, 2020.

8 California Building Codes: https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#@ViewBag.JumpTo, accessed on March 25, 2020.

1.2.15 Construction Schedule

The estimated construction schedule is shown in **Table 1-6, Construction Schedule**.

The estimated operational year is 2023.[9]

The existing medical office building (4,085 square feet), restaurant building (18,000 square feet), and surface parking lot (25,000 square feet), would be removed in accordance with the rehabilitation and reuse plan.

The Project will excavate 20 feet of depth to allow two levels of subterranean parking and foundation and utility work.

No fill will be imported to the Site.

The amount of materials exported will be 45,000 cubic yards.[10] Export would be deposited at Irwindale Dump Site in Azusa, approximately 40 miles from the Site (one-way).

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes.

Table 1-6
Construction Schedule

Phase	Schedule	Length
Demolition	July 13, 2021 – July 24, 2021	2 weeks
Site Preparation	July 27, 2021 – August 7, 2021	2 weeks
Grading	August 10, 2021 – October 9, 2021	9 weeks
Construction	October 12, 2021 – October 12, 2023	104 weeks
Architectural Coatings	February 12, 2023 – June 10, 2023	18 weeks
Paving	July 12, 2023 – September 12, 2023	9 weeks
Construction schedule, including start, end, and duration dates are estimates only. The air quality and noise analyses are based on the length of each phase. A later construction start assumes newer construction equipment that would replace older equipment, which would be more efficient in terms of emissions and noise output. Some overlap of phasing may occur. CAJA Environmental Services, May 2020.		

1.3 Discretionary Requests

Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:[11]

9 Transportation Impact Study, January 2020.

10 Estimates provided by the Applicant, May 2019. 56,250 cubic yards of loose soil (assumes 45,000 cubic yards of material with 25% swell of material).

11 Attachment A Submittal to the City, July 2020.

1) Pursuant to **LAMC Section 12.22.A.25(g)(3)**, the following six (6) Off-Menu Density Bonus waivers or modifications of development standards:

   a) to increase permissible FAR to 3.75:1 in lieu of the 1.5:1 FAR otherwise permitted.

   b) to permit residential parking at a ratio of 0.5 spaces per dwelling unit.

   c) to utilize any or all RAS3 yard requirements to provide 5-foot setbacks within the two side yards in lieu of the otherwise required 11-foot setbacks pursuant to LAMC Section 12.11.C.2.

   d) to reduce the otherwise required open space by 25%.

   e) to allow 6 stories, in lieu of the 3-stories that applies to commercial and mixed-use buildings in the 1-VL Height District.

   f) to allow an additional 22 feet in height over the otherwise permitted 45 feet prescribed in LAMC Section 12.21.1.

2) Pursuant **LAMC Section 12.24 U.26**, approval of a Conditional Use Permit to increase the density bonus greater than the maximum permitted in Section 12.22 A 25. The Applicant seeks a density bonus increase of 51% to permit 166 dwelling units in lieu of 110 dwelling units allowed based on the Project site's base density.

3) Pursuant to **LAMC Section 16.05**, the Applicant requests Site Plan Review for a development project that creates more than 50 dwelling units.

4) Pursuant to **LAMC Section 12.24.W.1**, the Applicant requests approval of a Master Conditional Use Permit for the sale or dispensing of a full line of alcoholic beverages for on- and off-site consumption only within up to five (5) premises.

Note: Pursuant to various sections of the LAMC, the Applicant will request administrative approvals and permits from the Building and Safety Department and other municipal agencies for Project construction actions, including but not limited to the following: demolition, excavation, paving, shoring, grading, foundation, building, haul route, street tree removal, and tenant improvements.

Section 2

Sustainable Communities Strategy Criteria

2.1 Sustainable Communities Strategy – Public Resources Code (PRC) § 21155

PRC § 21155(a). Consistency with the general use designation, density, building intensity, and applicable policies specified for the project area in a sustainable communities strategy.

Consistent. The Property is zoned C2-1VL and designated for Community Commercial land uses by the Silver Lake – Echo Park – Elysian Valley Community Plan (Community Plan), which include restaurant, retail, and multi-family residential. The Project is subject to the design regulations of the LAMC.

Pursuant to Section 12.17.1 of the LAMC, the zoning permits density equivalent to the R4 Zone at a ratio equivalent to one dwelling unit per 400 square feet of land area, allowing up to 110 units.[1]

Height District 1VL permits a maximum height of 45 feet. Commercial and mixed-use buildings in Height District 1VL – but not residential only buildings – are limited to 3 stories. The Project proposes a 6-story mixed-use building that is 67 feet in height. To permit the proposed 6 stories within such maximum height, the Applicant is requesting a waiver pursuant to LAMC Section12.22.A.25(g)(3) of the 3-story limitation for mixed-use buildings.

The Project would be consistent with the required open space, vehicle parking, and bicycle parking requirements of the LAMC with applicable reductions in open space and residential vehicle requirements.

The Project is consistent with the general land use designation, density, and building intensity in the Southern California Association of Government's (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) and 2020-2045 RTP/SCS.

Similar to the 2016-2040 RTP/SCS, the 2020-2045 RTP/SCS is a long-range visioning plan for the six-county SCAG region that highlights the existing land use and transportation conditions throughout the SCAG region and forecasts how it will meet the region's transportation needs between 2020 and 2045, as well as achieve the California Air Resources Board's (CARB) greenhouse gas (GHG) emissions reduction targets. Specifically, the 2020-2045 RTP/SCS identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian, as well as aviation ground access. It also includes a set of visions, goals, objectives, policies, and performance measures developed through public and stakeholder outreach sessions across SCAG's region. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 GHG emission reduction target. Collectively, the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS demonstrate how the SCAG region will achieve CARB's

[1] 43,896 / 400 = 110

identified targets, and for this reason, this SCPE addresses the consistency of the Project with both plans.

2016-2040 RTP/SCS

Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use types into 35 "place types," and then classified sub-regions into one of three land use development categories: Urban, Compact, or Standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (SCAG, 2016 RTP/SCS, p. 20-21.)

SCAG's 2016-2040 RTP/SCS growth strategy defines various urban footprint place types (SCAG, 2016-2040 RTP/SCS Appendix: SCS Background Documentation (at page 90), "Place Types Categorized into Land Development Categories (LDCs)"; SCAG 2016-2040 RTP/SCS Appendix: SCS Background Documentation (at page 90), "Urban Footprint—Place Types Summary," (at pages 1-2).

Based on Exhibit 13 and 14 of SCAG's SCS Background Documentation, the RTP/SCS categorizes the area surrounding the Project as 'Urban' for both 2012 and 2040. The RTP/SCS defines the 'Urban' areas as often found within and directly adjacent to moderate and high density urban centers. The most intense development types are anticipated in the 'Urban' Land Use Development Category, as compared to 'Compact' and 'Standard,' and is therefore the appropriate Land Use Development Category to accommodate the most intense development types. According to the RTP/SCS, nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multi-family and attached single-family (townhome), which tend to consume less water and energy than the large types found in greater proportion in less urban locations.

These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.[2]

The 'Urban' Land Use Development Category comprises the following urban footprint scenario models, including urban mixed use, urban residential, urban commercial, city mixed use, city residential, and city commercial.[3]

The Project Site would be consistent with the City Mixed-Use area and City Residential place types within the Urban Land Use Development Category, as described further below:

- City Mixed-Use areas are transit oriented and walkable, and contain a variety of uses and building types. Typical buildings are between 5 and 30 stories tall, with ground-floor retail space, and offices and/or residential on the floors above. Parking is usually structured below

2 SCAG, 2016-2040 RTP/SCS, Page 20, available at: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx, 2016, Accessed July 13, 2020.

3 SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 9, available at: http://www.scagrtpscs.net/Documents/2016/supplemental/LDC_PlaceType.pdf, 2016; SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 6, available at: http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf, 2016. Accessed June 14, 2019.

or above ground. The land use mix for this place type is typically approximately 28 percent residential, 17 percent employment, 35 percent mixed-use, and 20 percent open space/civic. The residential mix comprises 97 percent multi-family and 3 percent townhomes. The average total net Floor Area Ratio (FAR) is 3.4, floors range from 3 to 40 stories, and gross density ranges from 10 to 75 households per acre.[4]

- City Residential place types are "dominated by mid-and high-rise residential towers, with some ground-floor retail space, and offices and/or residences on the floors above. Parking is usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs." The land use mix for this place type is typically approximately 65 percent residential, four percent employment, 11 percent mixed use, and 20 percent open space/civic. The residential mix is 97 percent multi-family and three percent townhome. The average total net FAR is 2.9, floors range from 5 to 40 stories, and the gross density ranges from 35 to 37 households per acre.[5]

The location of the Project is consistent with the City Mixed-Use area and City Residential place type as described above.

The Project Site is located in a dense urban area surrounded by a diverse mix of land uses. The Project Site is located on Sunset Boulevard, which is a major commercial and retail corridor, with many amenities and services located within a short walking distance. A major supermarket (Von's) is located less than one block away from the Project Site, and two pharmacies (Rite-Aid and CVS) are located approximately two blocks away. The Project Site is located one block from the Echo Park Recreation Center, which will provide recreation and park resources to the Project's residents. Logan Street Elementary School and Gabriella Charter School are located approximately two blocks from the Project Site. The Edendale Branch of the Los Angeles Public Library is adjacent to the Project Site on Sunset. The Echo Park Senior Center is located approximately two blocks away from the Project Site. The Project Site is located in transit-rich and walkable area with connectivity to many areas within the City.

The Project's scale would be consistent with the City Mixed-Use area and City Residential place type as it would develop a Project up to 6 stories in height that would include residential, ground floor commercial, and subterranean parking in the highly-urbanized neighborhood in the City of Los Angeles. The Project is located in a major metropolitan area that is well served by regional and local transit, as well as other modes of transportation.

2020-2045 RTP/SCS

The 2020-2045 RTP/SCS includes strategies for accommodating forecasted population, household and employment growth in the SCAG region by 2045, as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles; an increase growth within walkable, mixed-use communities, and HQTAs; and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies,

4 SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 6, 2016, Accessed June 14, 2019.

5 SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 6, 2016, Accessed June 14, 2019.

and promoting a green region.

As a Land Use Tool, the 2020-2045 RTP/SCS identifies Priority Growth Areas (PGAs) throughout the SCAG region where 2020-2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers, Transit Priority Areas (TPAs), HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. These PGAs account for only 4 percent of region's total land area, but implementation of SCAG's growth strategies will help these areas accommodate an estimated 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045. This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region's resource areas.

- Job Centers: Areas with significantly denser employment than their surroundings. The 2020-2045 RTP/SCS prioritizes employment growth and residential growth in existing Job Centers in order to leverage existing density and infrastructure. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced.

- TPAs: Areas within one-half mile of a major transit stop that is existing or planned. According to the 2020-2045 RTP/SCS, focusing regional growth in areas with planned or existing transit stops is key to achieving equity, economic, and environmental goals. Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Growth within TPAs supports strategies outlined in the 2020-2045 RTP/SCS for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation.

- HQTAs: Areas within one-half mile from major transit stops and high-quality transit corridors. New developments should be context-sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed TODs can preserve existing development patterns and neighborhood character while providing a balance of housing choices.

- NMAs: Areas that focus on creating, improving, restoring, and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways and other destinations. NMAs have robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds. NMAs can encourage safer, multimodal, short trips in existing and planned neighborhoods and reduce reliance on single occupancy vehicles. NMAs support the principles of center focused placemaking. Fundamental to neighborhood scale mobility in urban, suburban, and rural settings is encouraging "walkability," active transportation and short, shared vehicular trips on a connected network through increased density, mixed land uses, neighborhood design, enhanced destination accessibility and reduced distance to transit. Targeting future growth in these areas has inherent benefits to Southern California residents – providing access to "walkable" and destination-rich neighborhoods to more people in the future.

- Livable Corridors: Livable Corridor land-use strategies include development of mixed-use retail centers at key nodes along corridors, increasing neighborhood-oriented retail at more intersections, applying a "Complete Streets" approach to roadway improvements, and zoning that allows for the replacement of underperforming auto- oriented strip retail between nodes

with higher density residential and employment. Livable Corridors also encourage increased density at nodes along key corridors, and redevelopment of single-story, under-performing retail with well-designed, higher density housing and employment centers.

The 2020-2045 RTP/SCS identifies these PGAs on Exhibits 3.4 through 3.10.[6] The Project Site is located within a NMA, a TPA, and a HQTA.

The Project is consistent with the general use designation, density, and building intensity set forth in the 2020-2045 RTP/SCS for each of these PGAs in that the Project includes development of multi-family housing on an infill site near transit and sources of employment, shopping, and entertainment, leveraging existing density and infrastructure and reduce the length of vehicle trips for residents.

Access and Transportation

Regional access is provided by US-101 (Hollywood) Freeway, located 2,600 feet south of the Site. Local access is provided by Sunset Boulevard (Avenue I in Mobility Plan 2035).

The intersection of Sunset Boulevard and Alvarado Street, located 450 feet west of the Site, provides access to the following lines: Metro 2, 4, 200, 302, 603, Rapid 704.

The Project would develop a 6-story mixed-use building on a 1.008-acre infill Project Site located in a highly urbanized part of the Silver Lake – Echo Park – Elysian Valley Community Plan Area of the City of Los Angeles. The Project Site is currently developed with a 1-story, 18,000 square foot restaurant (Taix Restaurant), a 1-story, 4,085 square foot medical office building, and associated surface parking lot. The medical office building, restaurant building, and the surface parking lot will be removed. The Site will be developed with a 6-story mixed-use residential building with a total of 166 residential units (9 studios, 120 one-bedroom, 33 two-bedroom units, and 4 three-bedroom units) and 13,000 square feet of commercial.

As shown in **Table 2-1, Proposed Land Use**, below, the Project would have a total floor area of 164,610 sf that would consist of approximately 92 percent residential uses and 8 percent non-residential uses. The Project's residential component is comprised of a total of 166 multi-family units, including 24 units set aside for Very Low Income households for a period of 55 years (14.5 percent of the Project's total units). The Project Site is accessible by regional and local transit, and the Project would provide bicycle and vehicle parking on-site.

The Project Site's conversion from a stand-alone restaurant, one-story medical/dental office and surface parking to a medium-density, mixed-use, pedestrian-friendly development incorporating affordable housing for Very Low Income Households provides a foundation for the implementation of other RTP/SCS strategies in the Project area, such as enhanced transit services facilitating the use of transit by more people, which in turn results in more funds for improvements and enhancements. Thus, the Project would encourage the utilization of public transit as a mode of transportation to and from the Project area and contribute to the productivity and use of the regional transportation system by providing housing and jobs near public transit.

6 2020-2045 RTP/SCS, Chapter 3: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-03-plan.pdf?1604533568

Table 2-1 below shows the proposed land uses, units/sf, FAR, and percentage of use for the Site.

Table 2-1
Proposed Land Use

Land Use	Units / Square Feet	Percent of Use
Residential	166 units / 151,610 sf	92%
Commercial	13,000 sf	8%
Total	**164,610 sf (3.75:1)**	**100%**
Plans, Togawa Smith Martin, Inc., October 1, 2020.		

Therefore, the Project is consistent with the 'Urban' Land Use Development Category, the urban land use designation, as well as the associated land use density and building intensity assumptions in the RTP/SCS. The Project is also consistent with the goals and policies in the RTP/SCS, as outlined in **Section 3, Project Consistency with SCAG's RTP/SCS**, for both the 2016-2040 version and 2020-2045 version.

The Project Site's land use designation in the City of Los Angeles (City) General Plan is Community Commercial. The proposed uses are consistent with the Commercial land use designation, which permits residential land uses. Therefore, the Project is consistent with this criterion.

PRC § 21155(b). To be considered a Transit Priority Project (TPP) as defined by §21155(b), the project must meet all of the following criteria. A TPP shall:

1) **Contain at least 50 percent residential use, based on total building square footage and, if the project contain between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;**

Consistent. The Project includes the development of a mixed-use development with residential and commercial restaurant land uses. The Project would include a total of 164,610 square feet of floor area resulting in a floor area ratio (FAR) of 3.75:1. The breakdown of area by land use is as follows:

- Residential Floor Area: 151,610 sf (92%)
- Commercial Floor Area: 13,000 sf (8%)

Based on the above calculations, the Project contains at least 50 percent residential use.

2) **Provide a minimum net density of at least 20 units per acre;**

Consistent. The Project would include 166 residential dwelling units on a 43,896 square foot (1.008 acre) Project Site. The Project's average residential density is 165 units per acre. Therefore, the Project is consistent with this criterion.

(3) Be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. A major transit stop is as defined in Section 21064.3, except that, for purposes of this section, it also includes major transit stops that are included in the applicable regional transportation plan. For purposes of this section, a high-quality transit corridor means a corridor with

fixed route bus service with service with service intervals no longer than 15 minutes during peak commute hours. A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area further than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor.

Consistent. The Project Site is designated as a Transit Priority Area and is within 0.5-mile (walking distance) of a major transit stop at the intersection of Alvarado Street and Sunset Boulevard. The intersection of Sunset Boulevard and Alvarado Street serves as a qualifying intersection for two bus routes. Metro line 603 travels north along Alvarado Street, while Metro line Rapid 704 travels along Sunset. It is located 450 feet southwest of the Project Site. Therefore, lines 603 and Rapid 704 are analyzed in **Table 2-2**.

Additionally, as stated previously, the Project Site is also located within an HQTA as defined by SCAG and a TPA as defined by SB 743. As such, the Project is consistent with this criterion.

Table 2-2
Major Transit Stop Analysis

Line	Direction	# Trips	Total Trips	Average Frequency	Qualifies?
Intersection (Sunset and Alvarado)					
Metro 603	North	15 AM Peak Hours trips	33	12.7 minutes	Yes
		18 PM Peak Hours trips			
	South	16 AM Peak Hours trips	36	11.67 minutes	
		20 PM Peak Hours trips			
Metro Rapid 704	East	11 AM Peak Hours trips	29	14.5 minutes	Yes
		18 PM Peak Hours trips			
	West	16 AM Peak Hours trips	33	12.7 minutes	
		17 PM Peak Hours trips			
Peak Periods are considered to be between 6:00 to 9:00 AM (180 minutes) and 3:00 to 7:00 PM (240 minutes) for a total of 420 minutes. Bus routes must have a service frequency of 15 minutes or less for the entire duration of the peak hour periods. To determine the eligibility of the bus line, the average number of minutes per trip for each direction is calculated separately. If one or both directions fail to meet the 15 minute frequency limit, the entire bus line is ineligible for a Major Transit Stop designation. The total number of trips from the point of origin during peak hours (Monday to Friday) is used. A trip is included if its median time falls within the peak hour. To calculate the median time, the time at trip origin is subtracted from the time at arrival at final station, divided by two, and then added to origin time. The total peak hour time (420 minutes) is then divide by the number of trips for the average number of minutes per trip. CAJA Environmental Services, June 2019.					

PRC § 21155.1(a). The transit priority project complies with all of the following environmental criteria:

(1) The transit priority project and other projects approved prior to the approval of

the transit priority project but not yet built can be adequately served by existing utilities, and the transit priority project applicant has paid, or has committed to pay, all applicable in-lieu or development fees.

Consistent. The Project Site is located within a highly urbanized area in the City of Los Angeles and is adequately serviced by the Los Angeles Department of Water and Power (water and electricity), the Bureau of Sanitation (sewer), natural gas (Southern California Gas Company), and telecommunications (cable and internet). The Project Site is currently developed with medical office and restaurant land uses and is adequately served by the existing utility infrastructure. Thus, development of the Project would not require the extension of utilities or roads to accommodate the proposed development.

In addition, as the Project is consistent with regional growth projections, the Project would not require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities beyond those already considered in the LADWP 2015 Urban Water Management Plan. Furthermore, the Project would be required to comply with numerous water conservation regulations contained in the Los Angeles Municipal Code (LAMC) to reduce water consumption (i.e., Ordinance Nos. 166,080; 180,822; 181,480; 181,899; 182,849; 183, 608; 183,833; 184,248; and 184,250), and with the California Green Building Standards Code, which contain standards designed for efficient water use.

Based on LADWP's demand projections provided in its 2015 Urban Water Management Plan[7], LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. As the Project's water demand is accounted for in the City's future projected demands (the 2012 RTP includes growth throughout the Los Angeles subregion and informs the LADWP 2015 UWMP; the 2016 RTP was released after the 2015 UWMP), the Project would not require the construction or expansion of new water treatment facilities that could cause a significant environmental effect. In general, projects that conform to SCAG's 2012 RTP demographic projections and are in the City's service area, are considered to have been included in LADWP's water supply planning efforts in the UWMP. In terms of the City's overall water supply condition, the water requirement for any project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.

LADWP has provided a Will Serve letter (included as **Appendix J** to this SCPE) that service is available and will be provided in accordance with the LADWP Rules and Regulations. The estimated power requirements for the Project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the system.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa

7 LADWP 2015 Urban Water Management Plan, page ES-20: "With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year period covered by this UWMP."

Monica Bay. The HTP currently treats an average daily flow of approximately 275 mgd.[8] Thus, there is approximately 175 mgd available capacity.

The Project Site is located in an urbanized area of the City. Under the existing condition, during a storm event, almost all stormwater that contacts the Project Site is directed to the existing storm drain system. Very little stormwater is absorbed into the ground at the Project Site. For the Project, the Project Applicant would be required to comply with the City's Low Impact Development (LID) Standards, and stormwater runoff from certain portions of the Project would be diverted to on-site bio-infiltration planters. Planter overflow and the remaining stormwater runoff would be directed to the existing storm drain system. The City would require that the Project be designed and constructed to minimize stormwater flows from the Project to not exceed existing flows. Thus, the Project's stormwater could be accommodated by existing drainage facilities.

The Project Site is already served by existing utilities and the Project can be adequately served. The Project Applicant will pay all applicable development fees. The existing public sanitary sewer main lines near the Project Site are owned and maintained by the City of Los Angeles Sanitation Department. Construction of the Project would include all necessary connections to adequately link the Project to the existing City water and sewer system. The proposed sizes and locations for the domestic water and fire water points of connection will be determined by the LADWP and City of Los Angeles Fire Department, respectively.

The Parks Dedication and Fee Update Ordinance (Park Fee Ordinance), Ordinance No. 184,505 (effective January 11, 2017) established a new citywide park fee and applies to all new residential dwelling units and joint living and work quarters, except affordable housing units and secondary dwelling units in single-family zones. The Park Fee Ordinance states that residential subdivision projects consisting of more than 50 residential units are subject to a Quimby in-lieu fee. The Park Fee Ordinance also establishes fees for non-subdivision projects, which applies to the Project. The Project would be required to demonstrate compliance with the Park Fee Ordinance prior to issuance of a certificate of occupancy.

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD Developer Fee Justification Study, recently updated in 2018, demonstrates that the LAUSD requires the full statutory impact fee to accommodate student impacts from development activity, to be consistent with Section 17620 of the California Education Code. The Project would be required to demonstrate proof of payment to the LAUSD prior to issuance of a certificate of occupancy.

The Project would pay all applicable in-lieu or development fees pursuant to code requirements and conditions of Project approval.

As such, the Project is consistent with this criterion.

(2) (A) The site of the transit priority project does not contain wetlands or riparian

8 https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl state=e9g2enwiy_5&_afrLoop=2223629005130851#!

areas and does not have significant value as a wildlife habitat, and the transit priority project does not harm any species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 at seq.), the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code), or the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), and the project does not cause the destruction or removal of any species protected by a local ordinance in effect at the time the application for the project was deemed complete.

(B) For the purposes of this paragraph, "wetlands" has the same meaning as in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993).

(C) For the purposes of this paragraph:

(i) "Riparian areas" means those areas transitional between terrestrial and aquatic ecosystems and that are distinguished by gradients in biophysical conditions, ecological processes, and biota. A riparian area is an area through which surface and subsurface hydrology connect waterbodies with their adjacent uplands. A riparian area includes those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems. A riparian area is adjacent to perennial, intermittent, and ephemeral streams, lakes, and estuarine marine shorelines.

(ii) "Wildlife habitat" means the ecological communities upon which wild animals, birds, plants, fish, amphibians, and invertebrates depend for their conservation and protection.

(iii) Habitat of "significant value" includes wildlife habitat of national, statewide, regional, or local importance; habitat for species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531, et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code); habitat identified as candidate, fully protected, sensitive, or species of special status by local, state, or federal agencies; or habitat essential to the movement of resident or migratory wildlife.

Consistent. The Project Site is located in a heavily urbanized area the City of Los Angeles. The Project Site is entirely developed with medical office and restaurant land uses with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Thus, the Project would not interfere with the movement of any residents or migratory fish or wildlife.

The Project Site does not contain any critical habitat or support 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 U.S. Fish and Wildlife Service.

Trees that are designated as "protected trees" as defined by Section 17.02 of the Los Angeles Municipal Code include oak trees (Quercus spp.), southern California black walnuts (Juglans californica), western sycamores (Platanus racemosa), and California bay laurels (Umbellularia californica), that have a trunk diameter at breast height (dbh) of at least four inches.

The Site contains 14 street trees (4 on Sunset, 10 on Reservoir), and none onsite (**Appendix B: Street Tree Report)**. None of the trees are protected species.[9] The Project would provide 42 new on site trees, a net increase of 28 trees on site, providing a substantial increase of potential habitat area on the Project Site. It is City's policy to retain or replace any street trees removed during project development. Specifically, the City's policy is to replace all significant, non-protected trees (8 inch or greater or cumulative trunk diameter if multi-trunked, as measured 54 inches above ground) at a 2:1 ratio with a minimum of 24-inch box tree. Further, per the City's Street Tree policies, the City Department of Public Works' Urban Forestry Division's policy is to replace street trees removed during the construction of a project. Therefore, any street trees that would be removed as part of the Project would be replaced in accordance with the City's policies. The final number and location of street trees would be determined in consultation with the City's Urban Forestry Division.

Additionally, the Project would comply with applicable regulatory compliance measures regarding non-protected tree removal and the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13) to ensure that the removal of the four mature non-protected street trees would result in a less than significant impact. Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory non-game birds (as listed under the Federal MBTA). With compliance with applicable regulatory compliance measures regarding non-protected tree removal and habitat modification, the Project would not harm any habitat of significant value.

The Project Site is fully developed and there are no open spaces with water courses such as streams or lakes. The Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have a substantial adverse effect on wetlands, riparian habitat, or other sensitive natural communities identified in federal, state, or local plans, policies, and regulations.

The Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.[10]

The Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[11]

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9 Street Tree Report, Arborgate Consulting, Inc., April 9, 2019.

10 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-4.

11 Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET Public online database, website: http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed July 13, 2020.

As such, the Project is consistent with this criterion.

(3) The site of the transit priority project is not included on any list of facilities and sites compiled pursuant to Section 65962.5 of the Government Code.

Consistent. Pursuant to Government Code Section 65962.5, the Department of Toxic Substances Control (DTSC) shall compile and update as appropriate, at least annually, a list of all hazardous waste facilities subject to corrective action (pursuant to Section 25187.5 of the Health and Safety Code), all land designated as hazardous waste property or border zone property (pursuant to Section 25220 of the Health and Safety Code), all information received by the DTSC on hazardous waste disposals on public land (pursuant to Section 25242 of the Health and Safety Code), and all site listed pursuant to Section 25356 of the Health and Safety Code.

The DTSC maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action, facilities, as well as existing site cleanup information. The Regional Water Quality Control Board (RWQCB) maintains a similar database (Geotracker). EnviroStor and Geotracker also provide information on investigation, cleanup, permitting, and/or corrective actions that are permitting, planned, being conducted, or have been completed under DTSC's and the RWQCB's respective oversight.

A Phase I Environmental Site Assessment (ESA) and a Phase II ESA for the Project was prepared (**Appendix C-1: Phase I Environmental Site Assessment** and **Appendix C-2: Phase II Environmental Site Assessment**).

As part of the Phase I ESA, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. 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 sites or facilities at the Project Site were listed in the databases.

The Phase I ESA did not identify a Recognized Environmental Condition (REC), a Historic REC, or a Controlled REC.

Therefore, the Project is not located on a site that is included on a list of hazardous material sites or create a significant hazard to the public or the environment.

(4) The site of the transit priority project is subject to a preliminary endangerment assessment prepared by a registered environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.

(A) If a release of a hazardous substance is found to exist on the site, the release shall be removed or any significant effects of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements.

(B) If a potential for exposure to significant hazards from surrounding properties

or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with state and federal requirements.

Consistent. The Phase I ESA identified the following business environmental risks:

- The review of regional environmental conditions indicates that the property immediately adjacent to the Site on the east was occupied by a gasoline service station and/or an automotive repair facility from the 1920s through the 1970s. Although there are no documented releases at the service station property, the long history of chemical use and the close proximity of the property indicate a potential for impacts to soil, soil vapor, or groundwater quality at the Site.

- The review also indicates the presence of a significant gasoline release at an off-Site property located about 275 feet southwest (cross-gradient) of the Site. The high levels of contamination (up to six feet of LNAPL [light non-aqueous phase liquid]) and the absence of full down-gradient evaluation of the extent of contamination from the Site indicates a potential for impacts to soil vapor or groundwater quality at the Site.

- A laundry facility was historically present on the Site in the 1940s. No documented hazardous chemical use or release has been identified at the facility. The historic Site occupancy by a laundry facility represents a potential risk of impact to soil, soil vapor, or groundwater quality at the Site; however, the results of the Phase II ESA indicated that there does not appear to be a soil vapor issue associated with historical laundry (or any other uses) on the Site.

Given the redevelopment plans for the Site, Northgate conducted a concurrent Phase II ESA to evaluate potential impacts to soil and soil vapor related to the identified business environmental risks. The VOC results indicate that there does not appear to be a soil vapor issue associated with historical laundry or other uses on the Site; however, the 1,1,2-TCA and ethylbenzene could be related to the former automotive maintenance facility to the east of the Site or the current gas station to the west of the Site. Given the presence of arsenic and lead in one soil boring (boring B5) exceeding regulatory screening criteria, Northgate recommends the following:

- Assessment of the lateral and vertical extent of lead in soil at boring B5 above hazardous waste criteria prior to excavation;

- Develop a soil management plan to address the management of the lead impacted soil, the potential segregation of “landfill cover” soil from “unrestricted use soil,” and management of any potentially impacted soil that might be encountered during excavation;

- Based on soil vapor data, plan on vapor mitigation or assess soil vapor beneath the restaurant building when it becomes accessible; and

- Properly remove and dispose any impacted soil encountered during development.

As recommended by the Phase II, the Project will be required as a condition of approval to implement the following Performance Standard:

Performance Standard HAZARD-1:

A Soil Management Plan (SMP) shall be prepared that addresses the management of the lead impacted soil, the potential segregation of "landfill cover" soil from "unrestricted use soil," and management of any potentially impacted soil that might be encountered during excavation. The SMP would assess the lateral and vertical extent of lead in soil at boring B5. Based on the soil vapor data, a vapor mitigation (in accordance with LAMC and EPA requirements for vapor intrusion into indoor air spaces) may be required underneath the restaurant building when it becomes accessible. These procedures would include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and properly removal and disposal procedures.

The SMP would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. This mitigation will ensure that the effects of the potential exposure will be mitigated to a level of less than significance in compliance with state and federal requirements.

An asbestos-containing materials (ACM) and lead-based-paint (LBP) survey was conducted for the Project buildings (**Appendix C-3: ACM and LBP Survey for 1911 Sunset** and **Appendix C-4: ACM and LBP Survey for 1931 Sunset**). The surveys found ACM and LBP in the 1911 Sunset building (restaurant) and ACM in the 1931 building (medical office). The identified asbestos will be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations. The identified LBP will be abated in accordance with applicable City, State, and federal regulations.

The Phase I ESA did not identify a Recognized Environmental Condition (REC), a Historic REC, or a Controlled REC.

(5) The transit priority project does not have a significant effect on historical resources pursuant to Section 21084.1.

Consistent. A Historical Resource Technical Report regarding the potential historic resource impacts of the Project was prepared by GPA Consulting, whose expert historians fulfill the qualifications for a historic preservation professional outlined in Title 36 of the Code of Federal Regulations, Part 61. GPA's January 2022 Historical Resource Technical Report is attached as Appendix D ("GPA Historic Resource Report").

Background - SurveyLA Discussion of Taix Restaurant

As part of the 2014 SurveyLA survey for the Silver Lake – Echo Park – Elysian Valley CPA, Taix was identified as appearing eligible for designation as a local landmark as the long-term location of the Taix Restaurant. The SurveyLA findings noted that the restaurant may not meet the eligibility thresholds for National Register or California Register listing. SurveyLA evaluated Taix Restaurant as a potential historic resource under the theme of "Commercial Identity. 1850-1980," and found Taix Restaurant eligible at the local level as an Historic Cultural Monument CM under Criterion A/1/1 (association with events that have made a significant contribution to the broad patterns of our history and cultural heritage), with a Status Code of 5S3 (appears to eligible for local listing or designation). SurveyLA's comment notes stressed the continuity of Taix French

Restaurant as a business over the years, stating that "Taix French Restaurant has been located [at 1911 W. Sunset Blvd.] since 1962.

Historical-Cultural Monument Proceedings and Lead Agency Evaluation of the Historic Resource

In response to an application from the Silver Lake Heritage Trust nominating Taix Restaurant as a Historic-Cultural Monument, the City undertook proceedings commencing in December 2109 and concluding in May 2020 to evaluate the potential significance of Taix Restaurant as a historic-cultural resource, and to consider its nomination to be designated a Historic-Cultural Monument of the City of Los Angeles. The complete administrative record for such proceedings (Council File 21-0119) is hereby incorporated by reference.

Silver Lake Heritage Trust's nomination contended that Taix Restaurant should be considered significant under Cultural Heritage Ordinance Criterion 1 (is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state or community), and Criterion 3 (embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values).

A "Preliminary Assessment Report" prepared by Historic Resources Group in support of the nomination found that Taix Restaurant appeared to be eligible for designation as an HCM under Criterion 1 as an important commercial institution in the Echo Park community as well as the long-term home of the second-generation Taix Restaurant under the theme of Commercial Identity. The Historic Resources Group Preliminary Report conceded that evaluating the significance of legacy businesses that are significant for their use rather than their architecture or design presents unique issues, stating "[e]valuating properties that are significant for their use is difficult, and the guidelines and eligibility standards are relatively subjective in comparison to the established thresholds for evaluating other types of significance."

The Taix family, which has continually owned and operated the restaurant since its founding submitted its plan for preserving the restaurant through the construction of a new facility at the restaurant's current premises as part of the Project. In his September 22, 2020 submission, Mike Taix explained that the restaurant's over-sized and aged building and infrastructure – and the property taxes, operational, staffing, maintenance and insurance costs associated with them – as well as changing public tastes, would lead to permanent closure of Taix Restaurant in the absence of the Project, and that preservation of the restaurant as a legacy business would require that the restaurant move into a smaller, approximately 5,000 square foot footprint with new kitchen, storage, HVAC facilities, with design features and appointments that would retain Taix's feel and sense of place while appealing to current customer preferences. The September 22nd submission explained that:

> Preserving the legacy of the Taix Restaurant is not a matter of bricks and mortar. It is a matter of restaurant economics and changing public tastes to which we must respond. Though we acknowledge the well-meaning intentions of the Silver Lake Heritage Trust and the Los Angeles Conservancy, preserving Taix is not something that can be accomplished with the tools of architectural history or by designating it as a City Historic-Cultural Monument. Indeed, well-meaning

> intentions can have negative and unintended consequences which could put an end to the Taix Restaurant if the City does not act with careful consideration.

The Taix family requested that if Taix French Restaurant was added to the City's list of Historic-Cultural Monuments, the designation be limited to the site of the restaurant (and not the existing building) and requested that the City find, among other things that: (1) The primary significance of Taix French Restaurant as a historic-cultural resource is as a commercial use and legacy business that has been dear to the hearts Angelinos for almost 100 years despite many changes in its location, premises, décor, format, and menu; (2) Preservation of the Taix French Restaurant as a historic-cultural resource requires that it be able to respond to economic and social challenges that compel changes in its current physical premises; and (3) The Taix family preservation plan will enable the continuation of Taix French Restaurant at its present site, and includes character-defining interior and exterior features that will continue to convey the historical significance of the restaurant and justify the inclusion of its site on the City's list of Historic-Cultural Monuments.

After concluding its public hearing on December 20, 2020, the Cultural Heritage Commission found that Taix French Restaurant did not meet Criterion 3 because the architectural quality of Taix Restaurant is negligible on the exterior and interior. The Cultural Heritage Commission found that the current Taix French Restaurant building is an amalgam of styles and additions to the building that existed at the property prior to Taix Restaurant's location there in 1962. The building is not an example of the French Normandy architectural style. The interior of the restaurant was reconfigured in 1969 and extensively remodeled in the late 1980's through the 2000's. The restaurant's continental-themed interior appointments, such as carpeted floors, drapery, acoustic drop ceilings, upholstered booths, chandeliers, large mirrored panels, and painted wall murals date from the last 25 years and are not historically significant.

The Cultural Heritage Commission determined that the significance of Taix French Restaurant as a historic-cultural resource is based on its intangible value to the community and its continuity as a business. After discussing how to best preserve Taix French Restaurant as a historic-cultural resource, the Cultural Heritage Commission unanimously voted to limit its Historic-Cultural Monument recommendation for Taix French Restaurant to significance only under Criterion 1 ("exemplifies the broad cultural, economic or social history of the nation, state, city or community"), and expressed a desire to permit the owner to make necessary changes to enable Taix French Restaurant to be continued as a legacy business.

The Planning and Land Use Management Committee of the City Council conducted a hearing on May 18, 2021, and considered the Cultural Heritage Commission recommendation and additional public testimony. The Committee adopted findings to reflect the Cultural Heritage Commission's recommendation and findings, and adopted the following additional finding:

> Section 22.171.10(f) of the City's Cultural Heritage Ordinance authorizes the City Council to approve or disapprove, in whole or part, the designation of a Historic-Cultural Monument, including any site, building or structure. The City Council finds and determines that the subject site and the Taix Restaurant are significant under Criterion 1 only. The Council finds that the Taix Restaurant building (and its interior and exterior architecture and decor) are not architecturally or historically significant: provided, however, that the City Council identifies the following physical features of

> the Taix Restaurant that should be preserved in order to convey the restaurant's historic significance and justify its designation as a Historic-Cultural Monument, as well as its eligibility for inclusion in the California Register of Historical Resources: (i) The red and white east-facing Taix billboard sign along Reservoir Street; (ii) the vertical red and white 'Cocktails' sign along Sunset Boulevard: and (iii) the restaurant's original cherry wood bar top.

On June 2, 2021, the City Council voted to adopt the findings and recommendations of the PLUM Committee and to designate Taix French Restaurant as a City of Los Angeles Historic-Cultural Monument. The City of Los Angeles is a Certified Local Government (CLG) under the Federal Preservation Program Partnership charged with protecting and designating a community's historic resources in accordance with State and local laws.

Due to errors in conducting the PLUM Committee's remote COVID-19 hearing protocol, certain persons were not called upon to speak at the May 18, 2021 Planning and Land Use Management Committee hearing. Accordingly, the Planning and Land Use Management Committee rescinded its prior action and conducted a subsequent *de novo* hearing on January 18, 2022. After concluding its hearing, the Planning and Land Use Management Committee recommended that the findings of the CHC, as amended by the PLUM Committee to include supplemental findings in the communication from the CD 13 Office dated December 6, 2021, be adopted as the findings of the Council and that Taix French Restaurant be designated a Historic-Cultural Monument. On January 26, 2022, the City Council voted to adopt the recommendations of the PLUM Committee.[12]

GPA Evaluation of the Project

While the City determined the significance of Taix Restaurant as a historic resource during the Historic-Cultural Monument proceedings, the proposed Project design itself was not considered by the Cultural Heritage Commission or the City Council. The GPA Historic Resource Report analyzes the Project design consistent with the prior determinations and findings of the Cultural Heritage Commission and the City Council.

The primary objective of the Project is to enable the continuation of Taix French Restaurant at its current location. Taix French Restaurant was founded in 1927 in downtown Los Angeles by the Taix family and has been continuously operated by the family since that time. In 1962, the restaurant was moved to its current location. Over the years, the restaurant has undergone repeated changes, including its location and alterations and additions to its building, architecture, décor, dining format, service style, and menu. Yet, despite these numerous changes, it is undisputed that the Taix French Restaurant has maintained its identity and significance as a beloved Los Angeles institution.

Due to the passage of time and changes in the economics of the restaurant and banqueting industry, as well as shifting public taste and preferences, the Taix family has concluded that the revenues of the restaurant can no longer support the overhead associated with its current property. The over-sized building, aged and outdated infrastructure, and other social challenges

[12] Incorporated by reference. Council File 21-0119 for Case No. CHC-2020-5524-HCM. Including all related hearings, files, resolutions, transcripts, and documents submitted: https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-0119

compel changes to the restaurant's current physical premises if Taix French Restaurant is to continue operating successfully. Already stressed by declining business conditions and the COVID-19 pandemic, the family has indicated that they would be forced to permanently close Taix French Restaurant due to the financial hardship of continuing operations in the current building.

Consistent with the deliberations and discussion of the Cultural Heritage Commission and City Council during the Historic Cultural Monument proceedings, the GPA Historic Resource Report discusses that preservation experts and communities around the country are now addressing "heritage" or "legacy" businesses as historical resources, and recognize that the question of how best to support their preservation requires a more nuanced analysis than typically associated with traditional historic preservation approaches. For example, in 2015, the National Trust for Historic Preservation recognized that the preservation of legacy businesses represents a desire to preserve "intangible elements of culture and community that these businesses have created over time" and that the topic presents unique preservation issues.[13]

Leading preservation organizations, such as San Francisco Heritage, reported that current economic conditions and other factors have caused "alarming loss of heritage businesses, nonprofits, and other arts and culture institutions." In its September 2014 report regarding strategies for conserving cultural heritage assets, San Francisco Heritage observed that "[t]raditionally focused on architecture and monuments, the field of historic preservation in the United States has in recent years begun to respond to calls from organized communities to develop new tools for identifying and protecting intangible social and cultural resources."[14]

Recognizing that legacy businesses are often considered important elements of communities for intangible reasons that have more to do with the relationship of the business to the community than their physical attributes, the San Francisco Heritage Report stated that "[d]espite their effectiveness in conserving architectural resources, traditional historic preservation protections are often ill-suited to address the challenges facing cultural heritage assets."[15] The report further states that "historic designation is not always feasible or appropriate, nor does it protect against rent increases, evictions, challenges with leadership succession, and other factors that threaten longtime institutions."[16] Significantly, the San Francisco Heritage Report recognized that, depending on goals and motivations, in some circumstances it may be appropriate to "prioritize continuation of traditional uses over the protection of the buildings that house them."[17] Accordingly, the San Francisco Heritage Report recommended the adoption of new strategies to enable the stabilization and preservation of legacy businesses, including providing economic incentives, providing a standard definition of "cultural heritage assets," adopting financial, zoning and process-driven incentives to encourage their conservation, and assisting with capital investment to address expensive capital improvement, seismic safety, and ADA accessibility

13 David Weible, "Seven Tips for Protecting Legacy Businesses," National Trust for Historic Preservation, accessed November 2021, https://savingplaces.org/stories/seven-tips-for-protecting-legacy-businesses#.XSObm3JYZPY.

14 San Francisco Heritage, *Sustaining San Francisco's Living History: Strategies for Conserving Cultural Heritage Assets* (San Francisco: 2014), 7, accessed November 2021, https://www.sfheritage.org/Cultural-Heritage-Assets-Final.pdf.

15 Ibid., 4.

16 Ibid.

17 Ibid., 17.

issues.[18] The work of groups such as the National Trust for Historic Preservation and San Francisco Heritage reflects an emerging consensus that a legacy business may constitute a historical resource in and of itself, and its significance as a resource may be distinguished from the premises in which the resource is located.

The GPA Historic Resource Report documents that Taix Restaurant has demonstrated the ability to change while successfully retaining its identity is consistent with its history and evolution as a legacy business. Taix French Restaurant has remained in business for nearly a century, and has been required to repeatedly adapt and evolve in order to continue. Despite changes to the restaurant's location, building, dining format, service style, menu and decor over the years, the Taix family has successfully maintained the continuity of the restaurant and its significance as a Los Angeles beloved institution. It has twice been recognized by the City of Los Angeles for its intangible contributions to the City's culture and community. For example, on the occasion of the restaurant's 60th anniversary in, the Los Angeles City Council issued a resolution finding that "Whereas Circumstances, Time and Places Have Changed During The Past Six Decades, But The Warmth, Camaraderie and Simply Good Food and Service Remain the Same. The Spirit of the Brothers – Les Frères – Lives."

Similarly, in a 1963 review entitled "Original Bargain Duplicated," the *Los Angeles Times* recognized the continuing identity of the already beloved institution despite its relocation from downtown to its current location and its change in décor and dining format:

> It is…somewhat, décor-wise, a far cry from the original Taix down on Commercial St. – tufted leather booths, carpeting, tablecloths, and attractive waitresses rather than 80-year-old waiters. Incidentally, the old Taix is still in business, hasn't yet been bulldozed as a lot of people seem to think. Anyway, at the so-called "new Taix," you get the same generous tureen of excellent vegetable soup, salad with the same garlicy dressing, huge serving of pot roast with large portions of tomato-infested zucchini, creamed au gratin potatoes, sherbet, and coffee—all for $2.25. It is not exactly a gourmet repast. But, you can't beat the price. What's more, they have a red mountain wine for 90 cents a half bottle (by Louis Martinez) that needs no apologies. And the cocktail lounge is exceptionally attractive. For an economical dine-out treat for the family or to take out a girlfriend on the night before payday, this is one of the town's better bargains.[19]

The GPA Historic Report confirmed that, consistent the recommendations and findings of the City's Cultural Heritage Commission and City Council the Taix Restaurant building (and its interior and exterior architecture and decor) are not architecturally or historically significant. Over the course of the restaurant's history, many of the physical features of the existing building had been updated and altered over time to fit the needs of a changing business and clientele, and the Taix family always tried to make the restaurant feel more nostalgic in character -- even when installing new features. Because these changes were made gradually over time, the GPA Historic Resources Report concludes that there is no one distinct period of Taix features and décor that characterizes the restaurant. Accordingly, the GPA Historic Resources Report confirms that the physical building's interior and exterior design is not authentically historically significant and was

18 Ibid., 16-35.

19 "Original Bargain Duplicated," *Los Angeles Times,* November 3, 1963, B94.

therefore does not to contribute to the significance of the restaurant as a historic entity.

The proposed Project would involve the demolition of the existing Taix Restaurant building and the construction of two new multi-use buildings and a new ground floor space for the Taix French Restaurant. However, the restaurant would continue to operate in the same location as it has since 1962, and City Council has determined that the restaurant's existing building and its interior were not significant. Completion of the Project would enable the preservation of Taix Restaurant as a legacy business by enabling the restaurant to stay in business. Unnecessary extra space and overhead would be eliminated by the smaller and more cost-efficient size commensurate with the restaurant's current needs, as well as needed new back-of-house infrastructure including kitchen facilities and storage.

The Taix family has worked closely with the Project design team to develop a project that incorporates the intangible qualities of Taix's first and second locations that have made Taix Restaurant a popular gathering place over its many years and contribute to its feeling of a legacy restaurant. The GPA Historic Resource Report finds that the Project will preserve the location, feeling, and association of the restaurant as a legacy business. The scale of the dining spaces, cocktail bar, and secondary "speakeasy" space would replicate the intimate atmosphere of the existing interior in conjunction with visually familiar features such as pressed tin ceilings, burgundy banquettes (booths), wall sconces, smoked glass mirrors, and pink and gold wallpaper. Per the City Council's direction during the Historic Cultural Monument proceedings, the significant physical features that were identified as conveying the restaurant's historic significance (the Taix billboard, red and white cocktails sign, and the cherry wood bar top) will all be carefully preserved and reincorporated into the restaurant's new design. The Taix billboard would be reinstalled at the sixth floor of the east elevation facing generally east toward Reservoir Street, similar to its current location and orientation. The vertical red and white "Cocktails" sign would be reinstalled on the southwest corner of the eastern building facing Sunset Boulevard, similar to its current location and orientation. The original cherry wood bar top would be installed in the cocktail bar in the new restaurant space. The exterior of the new restaurant also incorporates many of the design features from Taix's original location in downtown Los Angeles, including the pedestrian friendly storefronts, the clearstory windows, columns, awnings, and outdoor seating.

In summary, the GPA Historic Resource Report concludes that demolition would not significantly impact the Taix Restaurant as a legacy business because it would not materially impair the physical characteristics determined to convey its historical significance by the lead agency that justify its designation as an Historic Cultural Monument and eligibility for inclusion in the California Register. Most significantly, the Project facilitates the continuation of the restaurant as a legacy business. In the absence of the Project, the Taix family has indicated that they would be forced to permanently close Taix French Restaurant due to the financial hardship of continuing operations in the current building.

Therefore, the demolition would not result in material impairment as defined in 14 CCR § 15064.5(b)(2)(C), or, therefore, cause a substantial adverse change in significance of the historical resource as it was designated by the lead agency.

The GPA Historic Resource report also concludes that the demolition would have no impact on the three historical resources in the Study Area, and that the new construction would have no significant impact on the historical resources in the Study Area. Although a new visual element

would be introduced within their broader setting, it would not result in a substantial adverse change in their significance.

Section 21151.1 (a) (5) Determinations and Findings

The City of Los Angeles is a Certified Local Government (CLG) under the Federal Preservation Program Partnership charged with protecting and designating a community's historic resources in accordance with State and local laws. Status as a CLG enables a city to make determinations and apply the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards) regarding the status of historical resources and related project review. The City of Los Angeles also administers its adopted Cultural Heritage Ordinance, which enables the City Council to designate Historic-Cultural Monuments of the City of Los Angeles, and which regulates the demolition, substantial alteration or relocation of designated Historic-Cultural Monuments. The City Council also the lead agency under CEQA charged with evaluating the eligibility of the Project for a Sustainable Communities Project Exemption pursuant to Section 21151.1 of CEQA.

Based on the record of proceedings in the Historic-Cultural Monument proceedings and the GPA report, the lead agency makes the following determinations:

(a) the historic-cultural significance of Taix Restaurant is in its continuity and value as a legacy business, rather than in the restaurant's current physical premises;

(b) substantial evidence demonstrates that a legacy business may be considered a historic resource apart from its physical premises;

(c) the question of how best to support the survival and continuation of legacy businesses, such as Taix Restaurant, and thereby preserve them as historic-cultural resources, presents unique issues that must be evaluated on a case-by-case basis;

(d) the premises of Taix French Restaurant do not constitute its significance as a historical resource and their demolition will not materially impair the significance of Taix French Restaurant as a historical resource;

(e) approval of the Transit Priority Project will enable the preservation of Taix French Restaurant as a historical resource by avoiding its permanent closure and providing a new facility, sized to meet the current needs of Taix French Restaurant and designed by the Taix family, with upgraded and code compliant infrastructure, outdoor dining, which the Taix family has determined will be financially viable to operate in terms of its size and format;

(f) disapproval of the Transit Priority Project would result in significant and unavoidable adverse impacts to Taix French Restaurant as a historical resource because it would result in the permanent closure of the restaurant and thus the permanent loss of the historical resource; and

(g) Taix French Restaurant is designated as a City of Los Angeles Historic-Cultural Monument and, as a historically significant legacy business, will remain eligible for inclusion in the California Register of Historical Resources after the Transit Priority Project is implemented.

The Transit Priority Project will not have a significant effect on historical resources pursuant to

CEQA Section 21084.1 in that it will not materially impair the significance of Taix French Restaurant as a historical resource. The Transit Priority Project will not:

(i) Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;

(ii) Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code; or

(iii) Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources.

As recommended by the GPA Historic Resource Report to protect the billboard, cocktails sign, and cherry wood bar features identified by the lead agency as conveying its historic significance, the Project will be required as a condition of approval to implement the following Performance Standard:

Performance Standard HISTORIC-1:

- Prior to the development of final construction plans, the applicant shall ensure a historic preservation professional meeting the qualifications for architectural history or historic architecture outlined in Title 36 of the Code of Federal Regulations, Part 61 has reviewed and confirmed:
    - The three physical features (billboard, cocktails sign, and cherry wood bar) are clearly and properly identified on the demolition plans;
    - The demolition plans include detailed notes for careful removal and protection of the three physical features.
    - The construction plans include detailed drawings for reinstallation of the features in a manner that would not damage or destroy them or put them at risk of damage in the future.
- The applicant shall identify an appropriate climate-controlled and locked storage location for the three physical features (billboard, cocktails sign, and cherry wood bar) during construction that will prevent damage, vandalism, or theft. The applicant shall also identify an appropriate method to safely transport the features to this location. The location and transportation information shall be provided to a historic preservation professional meeting the qualifications for architectural history or historic architecture outlined in Title 36 of the Code of Federal Regulations, Part 61 to review and confirm.
- The applicant shall conduct a training for the construction team to ensure all workers that will be on the site are aware of the physical features, their significance, and their need for protection.

- Prior to the commencement of demolition of the buildings on the site, the applicant shall retain a qualified contractor or practitioner experienced with historic buildings and historic building elements to carefully remove the three physical features (billboard, cocktails sign, and cherry wood bar) from their existing locations prior to construction of the proposed Project.

- Following the completion of the proposed construction, the applicant shall retain a qualified contractor or practitioner experienced with historic buildings and historic building elements to install the three physical features (billboard, cocktails sign, and cherry wood bar) in their proposed new locations in a manner that does not damage or destroy the features or put them at risk of damage in the future.

As such, the Project meets this criterion.

(6) The transit priority project site is not subject to any of the following:

(A) A wildland fire hazard, as determined by the Department of Forestry and Fire Protection, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of a wildland fire hazard.

Consistent. The Project Site is located in an urbanized area of the Echo Park community in the City and does not include wildlands or high fire hazard terrain or vegetation. According to ZIMAS, the Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ). Therefore, the Project Site is not subject to wildland fires. As such, the Project meets this criterion.

(B) An unusually high risk of fire or explosion from materials stored or used on nearby properties.

Consistent. The Project Site consists of a medical office building and restaurant. These types of land uses are not typical operations associated with high risk of fire or explosions, such as industrial or warehousing facilities.

The buildings surrounding the Project Site are currently occupied by residential, office, retail, institutional, restaurant uses. These uses are also not typical operations associated with high risk of fire or explosions, such as industrial or warehousing facilities.

Any hazardous materials stored on such sites typically consist of small quantities of cleaning products and similar household and commercial materials. Such properties typically do not contain large quantities of hazardous materials that would pose an unusually high risk of fire or explosion.

There are no oil wells or oil fields on or near the Project Site.[20]

The Site is not in a methane zone.[21]

Therefore, the Project Site is not subject to an unusually high risk of fire or explosion from

20 https://maps.conservation.ca.gov/doggr/wellfinder/#/-118.94276/37.12009/6

21 http://zimas.lacity.org/

materials stored or used on nearby properties. As such, the Project meets this criterion.

(C) Risk of a public health exposure at a level that would exceed the standards established by any state or federal agency.

Consistent. The Project would include a Project Commitment for the preparation and enforcement of a Soil Management Plan (SMP), given the presence of arsenic and lead in one soil boring exceeding regulatory screening criteria. The SMP would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. The Project Commitments of a SMP would be included in the Project Plans. Therefore, the Project would not result in public health exposure at a level that would exceed the standards established by any state of federal agency. As such, the Project meets this criterion.

(D) Seismic risk as a result of being within a delineated earthquake fault zone, as determined pursuant to Section 2622, or a seismic hazard zone, as determined pursuant to Section 2696, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of an earthquake fault or seismic hazard zone.

Consistent. PRC Section 2622 requires the State Geologist to delineate earthquake fault zones and to continue to revise and delineate additional earthquake fault zones when warranted by new information. PRC Section 2696 requires the State Geologist to compile maps identifying seismic hazard zones. According to the Earthquake Fault Zone Map, the Project Site is not within the Alquist-Priolo Earthquake Fault Zone. A Geotechnical Investigation was conducted for the Project Site (**Appendix E: Geotechnical Investigation**). There are no known active faults crossing or projecting through the Project Site. Therefore, ground rupture due to faulting is considered unlikely at the Project Site.

The Project Site is located within an area mapped as a Liquefaction Zone. Inclusion of a site on the hazard map does not mean that a hazard actually exists at the site. It simply means that the characteristics of the site (shallow groundwater and alluvial soil deposits) require investigation of the hazard. Sedimentary bedrock (shale) was encountered at depths of 5 feet or less below the existing grade. Historic high ground water is at a depth of 20 feet below existing grade. The hard shale encountered below historic groundwater is not susceptible to liquefaction.

The Project will be required to comply with the existing building regulations associated with the City of Los Angeles Building Code, which incorporates the Uniform Building Code (UBC) and 2016 California Building Code (CBC), which contain provisions to mitigate seismic hazard the risk of an earthquake fault or seismic hazard zone. As such, the Project would not result in seismic risk as a result of being within a delineated earthquake fault zone or a seismic hazard zone. As such, the Project meets this criterion.

(E) Landslide hazard, flood plain, flood way, or restriction zone, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of a landslide or flood.

Consistent. The Project Site and surrounding area are fully developed and generally characterized by flat topography. The Project Site is not located in a landslide area as mapped

by the City of Los Angeles, or within a landslide zone as mapped by CGS, and the probability of seismically induced landslides occurring at the Project Site would be considered low (City of Los Angeles, Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51).

The Project Site is not located within a designated 100-year flood plain area as mapped by the Federal Emergency Management Agency (FEMA) or by the City (Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1610F, September 26, 2008; City of Los Angeles, Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plain, p. 57).

Furthermore, the probability of seismically induced landslides is low and the risk of flooding from a seismically induced seiche is remote. Therefore, the Project would not result in landslide hazard, flood plain, flood way, or restriction zone. As such, the Project meets this criterion.

(7) The transit priority project site is not located on developed open space.

(A) For the purposes of this paragraph, "developed open space" means land that meets all of the following criteria:

(i) Is publicly owned, or financed in whole or in part by public funds.

(ii) Is generally open to, and available for use by, the public.

(iii) Is predominantly lacking in structural development other than structures associated with open spaces, including, but not limited to, playgrounds, swimming pools, ballfields, enclosed child play areas, and picnic facilities.

(B) For the purposes of this paragraph, "developed open space" includes land that has been designated for acquisition by a public agency for developed open space, but does not include lands acquired with public funds dedicated to the acquisition of land for housing purposes.

Consistent. The Project Site is privately owned, has not been designated for acquisition by a public agency for use as open space, and is located in a highly urbanized area that includes a mixture of low-, mid-rise buildings containing a variety of residential, office, retail, institutional, and restaurant uses. The Project Site is currently occupied by buildings and associated surface parking lot, contains no active or passive recreational facilities, and has not been used by the public for recreational purposes. There is ornamental and decorative landscaping on the Project Site.

The immediate surrounding area is also fully built out with buildings and does not include any open spaces. Therefore, the Project is not located on developed open space. As such, the Project meets this criterion.

(8) The buildings in the transit priority project are 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations and the buildings and landscaping are designed to achieve 25 percent less water

usage than the average household use in the region.

Consistent. The Project would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure.

1. Energy Efficiency

As part of this analysis, a Title 24 Energy Performance Report was prepared to demonstrate how the Project will meet the criteria of PRC section 21155.1 subsection (a) (8) requirement for energy and water efficiency and be 15 percent more energy efficient than required by Title 24, Part 6, the California Energy Code (**Appendix F: Energy and Water Efficiency Compliance Report)**.

The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, high performance building envelop walls, roof, and floor, glazing windows, reduction of lighting power density with the use of high-efficacy LED lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems heat-pumps with SEER (seasonal energy efficiency ratio) =16 or higher, and centralized domestic hot water system with 95% thermal efficiency and a 50% solar thermal system. With the incorporation of these performance measures, the Project exceeds Title 24 standards by 17.3%.

2. Water Efficiency

The Project would utilize low flow water fixtures that achieves and exceeds the City of Los Angeles' water conservation goals. This was achieved with features such as energy star appliances for dishwasher and clothes washers, low flow faucets and fixtures (see table for targets), water-saving pool features (pool covers), water efficient drip irrigation systems and weather based-controllers-and drought-tolerant native plantings for landscaping. With the incorporation of the water efficient design, the Project would result in a 73.9% reduction from the estimated baseline.

As such, the Project meets this criterion.

PRC § 21155.1(b). The transit priority project meets all of the following land use criteria:

(1) The site of the transit priority project is not more than eight acres in total area.

Consistent. The Project Site includes approximately 43,896 square foot (1.008 acre) of lot area. As such, the Project Site is not more than eight acres in total area. As such, the Project meets this criterion.

(2) The transit priority project does not contain more than 200 residential units.

Consistent. The Project would include 166 residential dwelling units. Therefore, the Project would provide less than 200 residential units. As such, the Project meets this criterion.

(3) The transit priority project does not result in any net loss in the number of affordable housing units within the project area.

Consistent. The Project Site is currently developed with medical office and restaurant uses. There are no residential dwelling units on the Project Site. Therefore, the development of the Project would not result in the loss of affordable housing units within the Project Site and surrounding area. The Project will include 24 units reserved for Very Low Income Households for a period of 55 years. As such, the Project meets this criterion.

(4) The transit priority project does not include any single level building that exceeds 75,000 square feet.

Consistent. The Project would include a 6-story mixed-use building with 164,610 square feet of developed floor area as defined by the LAMC. The floor areas range from 16,7621 square feet on Level 1 to 30,241 square feet on Levels 3, 4, and 5. Therefore, the Project would not include a single level building that exceeds 75,000 square feet. As such, the Project meets this criterion.

(5) Any applicable mitigation measures or performance standards or criteria set forth in the prior environmental impact reports, and adopted in findings, have been or will be incorporated into the transit priority project.

Consistent. There are no prior environmental impact reports (EIR) or other environmental documents prepared specifically for the Project Site.

The City has identified two prior EIRs with mitigation measures that could apply to the Project – SCAG 2016-2020 RTP/SCS Final Program EIR and SCAG 2020-2045 RTP/SCS Final Program EIR). The Mitigation Monitoring and Reporting Plans (MMRPs) associated with these EIR provide a list of mitigation measures that SCAG determined a lead agency can or should consider, as applicable and feasible.

The SCAG RTP/SCS Mitigation Monitoring and Reporting Program (SCAG MMRP) provides a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. The SCAG's measures are not prescriptive on the Project, but nonetheless, the mitigation measures to be incorporated as conditions of approval for the Project are consistent with those applicable measures suggested in SCAG's MMRP, detailed below (refer to **Section 4, Mitigation Measures from Prior EIRs,** for both the 2016-2040 version and 2020-2045 version, for a full discussion of the Project's consistency with SCAG's MMRP). As noted therein, many of the mitigation measures identified by SCAG, beyond those discussed below, would not apply to the Project. As such, the Project meets this criterion.

(6) The transit priority project is determined not to conflict with nearby operating industrial uses.

Consistent. The properties surrounding the Project Site include commercial/retail, residential, and office land uses. There are no industrial or warehouse buildings located in the immediate vicinity of the Project Site. The nearest location zoned for industrial uses is located approximately 1,950 feet southwest of the Project Site, at 630 Alvarado at the intersection of Alvarado and Clinton Street. The location is zoned "CM-1VL," which is a commercial manufacturing zone and allows for light manufacturing uses by the City). It appears that the site and neighboring buildings are currently used for neighborhood commercial, rather than manufacturing, purpose. In any event, such area is significantly separated from the Project by intervening commercial and

residential uses, as well as topography. Therefore, the Project will not conflict with nearby operating industrial uses. As such, the Project meets this criterion.

(7) The transit priority project is located within one-half mile of a rail transit station or a ferry terminal included in a regional transportation plan or within one-quarter mile of a high-quality transit corridor included in a regional transportation plan.

Consistent. The Project Site is designated as a Transit Priority Area and is within 0.5-mile (walking distance) of a major transit stop at the intersection of Alvarado Street and Sunset Boulevard. The intersection of Sunset Boulevard and Alvarado Street serves as a qualifying intersection for two bus routes. Metro line 603 travels north along Alvarado Street, while Metro line Rapid 704 travels along Sunset. As such, the Project meets this criterion.

PRC § 21155.1(c). The transit priority project meets at least one of the following three criteria:

(1) The transit priority project meets both of the following:

(A) At least 20 percent of the housing will be sold to families of moderate income, or not less than 10 percent of the housing will be rented to families of low income, or not less than 5 percent of the housing is rented to families of very low income.

(B) The transit priority project developer provides sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of the housing units for very low, low-, and moderate-income households at monthly housing costs with an affordable housing cost or affordable rent, as defined in Section 50052.5 or 50053 of the Health and Safety Code, respectively, for the period required by the applicable financing. Rental units shall be affordable for at least 55 years. Ownership units shall be subject to resale restrictions or equity sharing requirements for at least 30 years.

Consistent. Based on a Project containing 166 units, 21.8% of the Project Site's base density (24 units) will be reserved for Very Low Income Households. Therefore, not less than 5 percent of the housing shall be rented to Very Low Income Households. The Project operator will enter into a housing regulatory agreement memorializing these requirements and making them binding on any successors or assigns for the regulatory period. As such, the Project meets these criteria.

(2) The transit priority project developer has paid or will pay in-lieu fees pursuant to a local ordinance in an amount sufficient to result in the development of an equivalent number of units that would otherwise be required pursuant to paragraph (1).

Consistent. The Project meets the criteria of part 1 of this subsection. Therefore, the Project meets the criteria of Section 21155.1(b).

(3) The transit priority project provides public open space equal to or greater than five acres per 1,000 residents of the project.

Consistent. The Project meets the criteria of part 1 of this subsection. Therefore, the Project meets the criteria of Section 21155.1(c).

Section 3
Project Consistency with Goals and Benefits of the SCAG RTP/SCS

The Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Project is consistent with SCAG policies. The Project would be consistent with applicable goals and policies presented within SCAG's 2016-2040 RTP/SCS as shown in **Table 3-1** and SCAG's 2020-2045 RTP/SCS as shown in **Table 3-2**.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
Goal 1 Align the plan investments and policies with improving regional economic development and competitiveness.	**Not applicable**. This goal is directed towards SCAG and the City of Los Angeles and does not apply to individual development projects such as the Project.
Goal 2 Maximize mobility and accessibility for all people and goods in the region.	**Consistent**. The City of Los Angeles has conducted a comprehensive study that describes the baseline health conditions in the City and provides a context for understanding the demographic conditions, social and economic factors, physical environment, access to health care, and health behaviors contributing to the health of City residents and workers. The findings are documented in the Health Atlas for the City of Los Angeles (Health Atlas), published in June 2013.[1] While the primary focus of the Health Atlas is on factors that affect the health behaviors and health status of residents and workers, much of the data is relevant to land use transportation and greenhouse gas (GHG) emissions as those topics reflect similar issues regarding land use patterns, urban design, and transportation systems. Data in the Health Atlas is organized by Community Plan Area (CPA). The Project Site is located in the Silver Lake – Echo Park – Elysian Valley CPA. According to the City data in the Health Atlas, the CPA is rated a 1.75 on the Walkability Index Score by Community Plan Area, which reflects medium walkability. City data in the Health Atlas also indicated that the CPA has the 10th highest (of 35) percentage of workers (approximately 18 percent) commuting to work by walking, biking, and public transportation. The statewide percentage of workers that commute to work by walking, biking, and public transportation is approximately 5.2 percent, based on census data for the 2011 to 2015 period. As the Health Atlas only tracks data at the CPA level, walkability data was also gathered for the Project Site specifically.

1 City of Los Angeles, The Health Atlas, (2013). Available at http://healthyplan.la/the-health-atlas/. Accessed July 1, 2019.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
	The Project Site is located on Sunset Boulevard, which is a major commercial and retail corridor, with many amenities and services located within a short walking distance. A major supermarket (Von's) is located less than one block away from the Project Site, and two pharmacies (Rite-Aid and CVS) are located approximately two blocks away. The Project Site is located one block north from Echo Park Recreation Center, which will maximize the accessibility of recreation and park resources to the Project's residents. Logan Street Elementary School and Gabriella Charter School are located approximately two blocks east from the Project Site. The Edendale Branch of the Los Angeles Public Library is adjacent to the west of the Project Site on Sunset Boulevard. The Echo Park Senior Center is located approximately two blocks to the west of the Project Site. The Project Site is located in a transit-rich location with connectivity to many areas within the City. A westbound stop for the Metro 2 (Downtown LA to Westwood) and 4 (Downtown LA to Santa Monica) lines is located directly in front of the Project Site, and an eastbound stop for the Metro 2 and 4 lines are located directly across Sunset Boulevard. The intersection of Sunset Boulevard and Alvarado Street, located 450 feet west of the Site, provides access to the following lines: 200 (Echo Park to Exposition Park), 302, 603 (Grand & Washington to Glendale), Rapid 704 (Downtown LA to Santa Monica). The Project Site is within a Transit Priority Area. "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 Public Resources Code (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. For purposes of Section 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (city) that are scheduled to be completed within the planning horizon of the RTP/SCS.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
	The Project Site is located within a Transit Oriented Communities Affordable Housing Incentive Area, and has received a Tier 3 (High) designation for its proximity its proximity to regular and rapid bus lines. The Mobility Plan 2035, which was initially adopted by the City Council in August 2015 and amended in November 2015, January 2016, and September 2016, is a comprehensive update of the City's Transportation Element that incorporates "complete streets" principles.[2] The Mobility Plan 2035 identifies a Transit Enhanced Network (TEN), a Neighborhood Enhanced Network (NEN) to support pedestrian activity, and an expanded Bicycle Enhanced Network (BEN). Among other provisions, the Mobility Plan 2035 includes roadway designations pursuant to updated policies and current transportation needs in the City. The Mobility Plan 2035 also incorporates by reference and updates provisions of City's 2010 Bicycle Plan; and serves as the basis for discussion of impacts on bicycle facilities below. The Mobility Plan 2035 designates a network of bicycle lanes (Tier 1 Protected, Tier 2 and Tier 3) and bicycle paths. Sunset Boulevard has a dedicated bike lane. It is located adjacent south of the Site.[3] The Project would include 134 bicycle parking spaces, which meets LAMC's requirements.

2 City of Los Angeles General Plan, Mobility Plan 2035, An Element of the General Plan, page 13. https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf, accessed July 1, 2019.

3 Los Angele Department of City Planning, 2010 Bicycle Plan, March, 2011. Available at: https://planning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf, accessed July 1, 2019.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
/SCS Goal 3 Ensure travel safety and reliability for all people and goods in the region.	**Not Applicable**. This goal is directed towards SCAG and the City of Los Angeles and not does apply to individual development projects such as the Project. Nevertheless, the Project would improve public safety infrastructure near the Project Site by providing new lighting within the Project Site and around the perimeter including new building identification, commercial accent lighting, wayfinding, balcony lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security. Pedestrian access to the Project would be distinct from vehicle driveways and the Project would not mix pedestrian and automobile traffic to ensure pedestrian safety. The Project would be subject to Site Plan review to ensure vehicle and pedestrian safety throughout the Project.
Goal 4 Preserve and ensure a sustainable regional transportation system.	**Consistent**. The Project is located in a dense urban area, and would be intensify the use of the Project Site with a mixed-use project with an affordable housing component. Increased density provides a foundation for the implementation of other strategies such as enhanced transit services and facilitates the use of transit by more people. Given the Project's close proximity to multiple bus lines, the Project will encourage the utilization of transit as a mode of transportation to and from the Project area. As a result, Project residents, workers, and visitors would utilize the nearby mass transit options which would further SCAG's goal to preserve and ensure a sustainable regional transportation system.
Goal 5 Maximize the productivity of our transportation system.	**Consistent**. The Project would encourage the use of mass transit, walking and bicycling, as the Project would locate mixed-use residential with an affordable housing component and commercial development on a Project Site that is located near multiple bus lines and a bike lane. Given the Project would develop residential uses within walking distance of existing bus lines, and would also provide long-term and short-term bicycle parking, the Project will provide opportunities for residents and visitors to use public transit for work trips, and walk to commercial, retail, recreational, educational, and social service uses in the immediate vicinity of the Project Site. Thus, the Project will encourage the utilization of mass transit as a mode of transportation to and from the Project area and contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
Goal 6 Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent**. The Project will facilitate the use of alternative modes of transportation which will aid in reducing car trips and positively impact air quality. The Project includes 134 bicycle parking spaces for the residential and commercial uses of the Project. The Project would encourage pedestrian travel by incorporating new residential and commercial development within walking distance of commercial, retail, recreational, educational, and social service uses in the immediate vicinity of the Project Site, as well as within close proximity to transit. Furthermore, the Project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience.
Goal 7 Actively encourage and create incentives for energy efficiency, where possible.	**Consistent**. The Project would be required to comply with Title 24 of the California Code of Regulations (CCR). To determine the Project's specific energy and water use, an Energy & Water Efficiency Compliance Memo has been prepared (**Appendix F: Energy and Water Efficiency Compliance Report**). As shown therein, the Project would be designed to be at least 15 percent more energy efficient than the applicable Title 24 standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region. The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, high performance insulated low-E windows, reduction of lighting power density with the use of high-efficacy LED lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems heat-pumps with SEER=16 or higher, and centralized domestic hot water system with 95% thermal efficiency and a 50% solar thermal system along with low flow water fixtures that achieves and exceeds the City of Los Angeles' water conservation goals. The water savings features was achieved with features such as energy star appliances for dishwasher and clothes washers, low flow faucets and fixtures (see table for targets), water-saving pool features (pool covers), water efficient drip irrigation systems and weather based-controllers-and drought-tolerant native plantings for landscaping.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
Goal 8 Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent**. The Project would encourage the use of transit, walking and bicycling, as the Project would locate mixed-use residential, office, and commercial development on a Project Site that is located near multiple bus lines and a bike lane. The Project would be a greater intensity than what currently exists on the Project Site. Based on 166 units, 21.8% of base density (24 units) of the Project Site (or 14.5% of the Total Project as defined by the TOC Guidelines) would set aside for very low income households for 55 years. Increased density provides a foundation for the implementation of other strategies such as enhanced transit services and facilitates the use of transit by more people. In turn, as transit ridership in an area increases with density, local transit providers are justified in providing enhanced transit services for the area. As a result, the Project would encourage land use and growth patterns that facilitate transit and active transportation by: providing a mix of land uses; creating a range of housing opportunities and choices for people at different income levels; creating walkable areas; providing infill development within existing communities; providing a variety of transportation choices; and providing opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project site.
Goal 9 Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Not applicable**. This goal is directed towards SCAG to ensure the safety and security of the regional transportation system.
Guiding Policy 1 Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	**Not Applicable.** This policy is directed towards SCAG in allocating transportation investments.
Guiding Policy 2 Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	**Not Applicable.** This policy is directed towards SCAG in allocating transportation system funding.
Guiding Policy 3 RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	**Not Applicable.** This Goal is directed towards SCAG and the City and not does apply to the Project.
Guiding Policy 4 Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	**Not Applicable.** This policy is directed towards transportation investment by SCAG.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
Guiding Policy 5 HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	**Not Applicable.** This policy is directed towards transportation investment by SCAG to support high occupancy vehicles (HOV), transit and rideshare.
Guiding Policy 6 The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	**Not Applicable.** This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles.
Guiding Policy 7 The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.	**Not Applicable.** This policy is directed towards SCAG transportation projects to encourage and support transportation investments.
Guiding Policy 8 Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.	**Not Applicable.** This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments, and does not apply to the Project.
Land Use Policy 1 Identify regional strategic areas for infill and investment.	**Not Applicable.** This policy is directed towards SCAG to identify regional strategic areas.
Land Use Policy 2 Structure the plan on a three-tiered system of centers development.[4]	**Not Applicable.** This Land Use Policy is directed towards SCAG and not does apply to the Project.
Land Use Policy 3 Develop "Complete Communities."	**Consistent**. SCAG describes the development of "complete communities" as a way to provide areas that encourage households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.[5] As stated above, the Project would place residential uses in a transit-rich area. The Project Site's location near mass transit and in proximity to services, retail stores, and employment opportunities along the Santa Monica Boulevard corridor promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Thus, the Project would be consistent with this land use policy.

4 SCAG, High Quality Transit Areas 2016 – SCAG Region, http://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0, accessed on January 2, 2020.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
Land Use Policy 4 Develop nodes on a corridor.	**Not Applicable.** The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and City goals to identify and develop locations that promote nodes.
Land Use Policy 5 Plan for additional housing and jobs near transit.	**Consistent.** The Project Site is located in an urbanized area in the City. The Project would develop 166 residential dwelling units within an HQTA, as defined by SCAG, and a TPA as defined by SB 743.
Land Use Policy 6 Plan for changing demand in types of housing.	**Consistent.** Based on 166 units, 21.8% of base density (24 units) of the Project Site (or 14.5% of the Total Project as defined by the TOC Guidelines) would set aside for very low income households for 55 years.
Land Use Policy 7 Continue to protect stable, existing single-family areas.	**Consistent.** The Project Site does not contain residential units. The Project would not displace, any existing single-family residential neighborhoods. The Project would provide additional housing (including units restricted for Very Low Income Households) on an infill lot within the City.
Land Use Policy 8 Ensure adequate access to open space and preservation of habitat.	**Consistent.** The Project Site is located within an urbanized area of the City. Development of the Project would not remove any existing open space areas or habitat, since the Project Site is fully developed. The Project would provide open space in accordance with LAMC requirements.
Land Use Policy 9 Incorporate local input and feedback on future growth.	**Not Applicable/Consistent.** This Land Use Policy is directed towards SCAG and does not necessarily apply to the Project.
Benefit 1: The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvements, and efficient transportation infrastructure.	**Consistent**. The Project would encourage the use of transit, walking and bicycling, as the Project would locate mixed-use residential and commercial development on a Project Site that is located near multiple bus lines and a bike lane. The Project would provide a variety of dwelling unit sizes, including studio, one-bedroom, two-bedroom and three-bedroom units that accommodate a range of household types and sizes. Based on 166 units, 21.8% of base density (24 units) of the Project Site (or 14.5% of the Total Project as defined by the TOC Guidelines) would set aside for very low income households for 55 years.

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
	The Project has been designed to include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience. The Project is located in a major metropolitan area that is well served by regional and local transit, as well as other modes of transportation. The Project Site is located in transit-rich and pedestrian accessible locations with connectivity to many areas within the City. The intersection of Sunset Boulevard and Alvarado Street, located 450 feet west of the Site, provides access to the following lines: Metro 2, 4, 200, 302, 603, Rapid 704. The Project would also provide 134 long-term and short-term bicycle parking which would help people have more opportunities to bicycle, walk and pursue other active alternatives to driving. The Project's location in an urban infill area would provide residents and visitors with shopping and dining options that are easily accessible on foot or by bicycle. The Project will contribute to the productivity and use of the regional transit system by providing housing and jobs near transit.
Benefit 2: The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.	**Not applicable.** Benefit 2 is directed towards SCAG and does not apply to individual projects such as the Project. Nevertheless, the Project is an infill, mixed use project that would increase the density on the Project Site, which is located within a High Quality Transit Area and a Transit Priority Area. As such, the Project would support and encourage non-vehicular travel, thereby decreasing trips and congestion, and the time and cost of traveling between places.
SCS Benefit 3: The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.	**Consistent**. The Project would be designed to be at least 15 percent more energy efficient than the applicable Title 24 standards and to be designed to achieve at least 24 percent less water usage than the average household use in the region. The Project would achieve its energy efficiency through the implementation of multiple measures including, but not limited to, high performance insulated low-E windows, reduction of lighting power density with the use of high-efficacy LED lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems heat-pumps with SEER=16 or higher, and

Table 3-1
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
	centralized domestic hot water system with 95% thermal efficiency and a 50% solar thermal system along with low flow water fixtures that achieves and exceeds the City of Los Angeles' water conservation goals. The water savings features was achieved with features such as energy star appliances for dishwasher and clothes washers, low flow faucets and fixtures (see table for targets), water-saving pool features (pool covers), water efficient drip irrigation systems and weather based-controllers-and drought-tolerant native plantings for landscaping. The Project would also allow for lower transportation costs for the Project's future residents by incorporating bicycle-and pedestrian-friendly elements and being located near multiple bus lines. The Project's location and design will provide future residents with various affordable transportation options.
Benefit 4: Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.	**Consistent**. The Project would encourage improved access and mobility by providing residential uses for people at different income levels within walking distance of existing bus lines and light rail transit stations, including multiple bus lines. The Project would also provide 134 long-term and short-term bicycle parking which would help people have more opportunities to bicycle, walk and pursue other active alternatives to driving. The Project's location in an urban infill area would provide residents and visitors with commercial, retail, recreational, educational, and social service uses in the immediate vicinity of the Project Site that are easily accessible on foot or by bicycle. The Project's design and location would help to improve air quality and the well-being of people as they would have greater opportunities for pedestrian and bicycling activity and to reduce their reliance on automobiles.
Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016.	

Table 3-2
Consistency with SCAG's 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
Goal 1 Encourage regional economic prosperity and global competitiveness.	**Not Applicable.** This goal is directed towards SCAG and the City and does not apply to the Project. However, the Project would construct housing near sources of employment, shopping, and entertainment in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods	**Consistent.** The Project Site is located along the Sunset Boulevard, which is developed with sources of employment, shopping, and entertainment. The intersection of Sunset Boulevard and Alvarado Street, located 450 feet west of the Site, provides access to the following lines: 200 (Echo Park to Exposition Park), 302, 603 (Grand & Washington to Glendale), Rapid 704 (Downtown LA to Santa Monica). The Project Site is also located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area (TPA) as defined by SB 743, each of which support transit opportunities and promote a walkable environment. The Project is an infill development that includes development of the Project Site with a 6-story residential building, with 166 dwelling units inclusive of 24 dwelling units (14.5 percent) restricted to Extremely Low Income Households and would place residents near transit. Additionally, the Project would include a total of 134 bicycle parking spaces, which would support cycling as a form of transportation. Given the fact that the Project would develop new residential units (including affordable units) within walking distance of existing transit stops and sources of employment, shopping, and entertainment, the Project would provide accessibility for residents to use public transit for work and personal trips. Thus, the Project would encourage the utilization of transit, bicycling, and walking as modes of transportation to and from the Project Site and contribute to the productivity and use of the regional transportation system by providing a residential development near transit. The Project is consistent with this goal.

Table 3-2
Consistency with SCAG's 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable**. This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 4 Increase person and good movement and travel choices within the transportation system.	**Consistent.** The Project would construct a residential development within a walkable urban mixed-use neighborhood with existing sources of employment, shopping, and entertainment. The Project would include 134 bicycle parking spaces. The intersection of Sunset Boulevard and Alvarado Street, located 450 feet west of the Site, provides access to the following lines: 200 (Echo Park to Exposition Park), 302, 603 (Grand & Washington to Glendale), Rapid 704 (Downtown LA to Santa Monica). Thus, the Project would increase personal mobility and provide increased travel choices to residents.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project includes the infill development of a site located in a densely-developed area of the City, with 166 multi-family residential dwelling units of which 24 would be set aside as Extremely Low Income units. The Project Site is in close proximity to sources of employment, shopping, entertainment, and transit lines that would allow for users of the Project to travel via transit rather than via vehicle. In addition, the Project's inclusion of 134 bicycle parking spaces would encourage cycling as a mode of transportation. The Project would thereby contribute to an overall reduction in VMT and associated GHG emissions.
Goal 6 Support healthy and equitable communities.	**Consistent.** The Project would construct a residential development near existing sources of employment, shopping, and entertainment. Project residents would be able to walk and bike to work/home and to shop. In addition, the Project Site's location near robust transit opportunities would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions.

Table 3-2
Consistency with SCAG's 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
	Also, the Project would include approximately 134 bicycle parking spaces, which would encourage bicycling as a form of transportation. By developing new housing (including affordable housing) and facilitating alternatives to driving, the Project would support healthy and equitable communities.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent**. The Project includes construction of a residential development on an infill site in an urbanized area of the City that is near several sources of transit. Also, the Project includes 134 bicycle parking spaces. This type of transit-oriented residential project helps to reduce dependence on automobile travel and to reduce mobile-source GHG emissions.
Goal 8 Leverage new transportation technologies and data-driven solutes that result in more efficient travel.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent.** The Project includes construction of a mixed-use development, including 166 multi-family residential dwelling units of which 24 would be set aside as Extremely Low Income units, on a site that is located in close proximity to transit. Also, the Project includes 134 bicycle parking spaces, which would support residents who choose to travel via bicycle. Further, the Project Site is located in close proximity to sources of employment, shopping, and entertainment to which Project residents could bike, walk, or use transit.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.

Table 3-2
Consistency with SCAG's 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities..	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This principle is directed toward SCAG that has the responsibility of monitoring the progress of the 2020-2045 RTP/SCS.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: Southern California Association of Governments, 2020-2045 RTP/SCS, September 2020.	

Section 4
Mitigation Measures from Prior EIRs

Public Resources Code (PRC) Section 21151.2 requires that a Transit Priority Project (TPP) also incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Prior applicable EIRs include SCAG's 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Program EIRs.

The Mitigation Monitoring and Reporting Programs for the 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS Program EIRs (SCAG MMRPs) include programmatic mitigation measures to be implemented by SCAG and project-level mitigation measures that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review.

As stated by SCAG, SCAG has no authority to impose mitigation measures on individual projects for which it is not the lead agency. However, for projects seeking to use CEQA streamlining and/or tier from the Program EIRs, project-level mitigation measures included in the Program EIRs (or comparable measures) should be required by the local lead agency as appropriate and feasible. Many lead agencies have existing regulations, policies, and/or standard conditions of approval that address potential impacts. Nothing in the Program EIRs is intended to supersede existing regulations and policies of individual jurisdictions. Since SCAG has no authority to impose mitigation measures, mitigation measures to be implemented by local jurisdictions are subject to a lead agency's independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in the Program EIRs as appropriate to address project-specific conditions. The determination of significance and identification of appropriate mitigation is solely the responsibility of the lead agency.

To comply with PRC Section 21151.2, the City has reviewed all mitigation measures contained in the SCAG MMRPs and determined their applicability to the Project. For each such mitigation measure, the City considered whether to incorporate the mitigation measure from SCAG's Program EIRs or whether an equally effective existing City mitigation measure/standard condition of approval other City regulation or federal, state, or regional regulation would supersede SCAG's mitigation measures.

The City's applicability determination is found on **Table 4-1** for the 2016-2040 RTP/SCS and **Table 4-2** for the 2020-2045 RTP/SCS.

Table 4-1
Mitigation Measures from Prior EIR (SCAG 2016-2040 RTP/SCS)

Impact Category	Project-level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Aesthetics (AES)		
AES-1: Potential to have a substantial adverse effect on a scenic vista.	**MM-AES-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to “break up” large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that	No mitigation measure is applicable. The Project Site is a mixed-use, infill project in a TPA located close to numerous bus transit lines. The Site is within a High Quality Transit Area (HQTA), which reflect areas with rail transit service or bus service where lines have peak headways of less than 15 minutes. The intersection of Sunset and Alvarado, located 450 feet west of the Site, provides access to the following lines: Metro 2, 4, 200, 302, 603, Rapid 704. Consistent with Public Resources Code Section 21099(d)(1) and City of Los Angeles Zoning Information File ZI No. 2451 the Project’s visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide are not be considered a significant impact pursuant to CEQA. Notwithstanding that the Project’s aesthetic effects are not considered significant environmental impacts pursuant to PRC Section 21099(d)(1), it is noted that: • The Project uses a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • The Project uses alternating facades to “break up” large facades and provide visual interest.

	clear-cutting is not evident. • Provide new corridor landscaping that respects and provides appropriate transition to existing natural and manmade features and is complementary to the dominant landscaping or native habitats of surrounding areas. • Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) will be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.	
AES-2: Potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	No mitigation.	No mitigation measure is applicable. Consistent with Public Resources Code Section 21099(d)(1) and City of Los Angeles Zoning Information File ZI No. 2451 the Project's visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide are not be considered a significant impact pursuant to CEQA.
AES-3: Potential to substantially degrade the existing visual character or quality of the site and its surroundings.	**MM-AES-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the	No mitigation measure is applicable. Consistent with Public Resources Code Section 21099(d)(1) and City of Los Angeles Zoning Information File ZI No. 2451 the Project's visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide are not be considered a significant impact pursuant to CEQA. Notwithstanding that the Project's aesthetic effects are not considered significant environmental impacts pursuant to PRC Section 21099(d)(1), the Project would comply with the following requirements:

	following, or other comparable measures identified by the Lead Agency: • Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. • Design projects consistent with design guidelines of applicable general plans. • Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. • Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.	• Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104. • The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to LAMC Section 91.8104.15. • All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41.
AES-4: Potential to create a new source of	**MM-AES-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified	No mitigation measure is applicable. Consistent with Public Resources Code Section 21099(d)(1) and City of Los Angeles

substantial light or glare which would adversely affect day or nighttime views in the area. Potential to result in shade and shadow impacts.	mitigation measures capable of avoiding or minimizing the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. • Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations. • Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. • Use unidirectional lighting to avoid light trespass onto adjacent properties. • Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. • Provide structural and/or vegetative screening from light-sensitive uses. • Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass	Zoning Information File ZI No. 2451 the Project's visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide are not be considered a significant impact pursuant to CEQA. Notwithstanding that the Project's aesthetic effects are not considered significant environmental impacts pursuant to PRC Section 21099(d)(1), the Project would comply with the following requirements: • LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the window and outdoor recreation/habitable areas of residential units from being illuminated by more than two foot-candles, or from receiving direct glare from the light source. Direct glare, as used in the LAMC, is a glare resulting from high luminesce or insufficiently shielded light sources that is in the field of view. • During construction, floodlights would be focused on the work area and be shield to focus light onsite and preclude light trespass onto nearby properties. Per the LAMC, construction hours would be limited to 7 AM to 9 PM Monday through Friday, 8 AM to 6 PM on Saturday, and no work on Sunday. • Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent residential properties, the public right-of-way. • The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective glass to minimize glare and reflected heat. Low-E (low emissivity) glass shall be permitted.

	used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties	
Agricultural and Forestry Resources (AF)		
AF-1: Potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.	**MM-AF-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into account project and site-specific considerations as applicable and feasible: • For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act). • Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. • Maintain and expand agricultural land protections such as urban growth boundaries. Support the acquisition or voluntary dedication of	This mitigation measure does not apply to the Project. The Project Site is highly urbanized and has no farmland or agricultural activity on or in the vicinity of the Project Site.

	agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments will be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the conservation easement agreements are upheld. The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking) "A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permitees who need to satisfy legal requirements and compensate for the environmental impacts of developmental projects. A privately owned conservation or mitigation bank is a free-market enterprise that: • Offers landowners economic incentives to protect natural resources; • Saves permitees time and money by providing them with the certainty of preapproved compensation lands; • Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values; • Provides for long-term protection and management of habitat. A publicly owned conservation or mitigation bank: • Offers the sponsoring public agency advance	

	mitigation for large projects or multiple years of operations and maintenance." In 2013, the University of California published an article entitled "Reforms could boost conservation banking by landowners" that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs. • Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. • Include underpasses and overpasses at reasonable intervals to maintain property access. • Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. • Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible. • Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.	
AF-2: Potential to conflict with existing zoning for agricultural use, or a	**MM-AF-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the	This mitigation measure does not apply to the Project, because the Project Site and nearby areas are not zoned for agricultural production, there is no farmland at the Project Site or in nearby

Williamson Act contract.	significant effects from conflict with existing zoning for agricultural use or a Williamson Act contract that are within the jurisdiction and responsibility of the California Department of Conservation, other public agencies, and Lead Agencies. Where the Lead Agency has identified that a project has potential for significant effects, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of agriculture and forestry resources to ensure compliance with the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the California Land Conservation Act of 1965, the Farmland Security Zone Act, and county and city zoning codes, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and sites-pecific considerations as applicable and feasible: • Project relocation or corridor realignment to avoid lands in Williamson Act contracts. • Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. • Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.	areas, and there are no Williamson Act Contracts in effect for the Project Site or in nearby areas.
AF-3: Potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public	No mitigation.	No mitigation applies.

Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).		
AF-4: Potential to result in the loss of forest land or conversion of forest land to non-forest use.	**MM-AF-1(b)** and **MM-GHG-3(b).**	This mitigation measure does not apply to the Project. The Project Site is currently nonforest use; therefore, no forest land will be lost or converted to non-forest uses.
AF-5: Potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non agricultural use or conversion of forest land to non-forest use.	**MM-AF-1(b)** and **MM-GHG-3(b).**	This mitigation measure does not apply to the Project because the Project Site is currently not used for any agricultural uses and is not forest land; therefore, no agricultural use or forest land will be converted.
Air Quality		
AIR-1: Potential to conflict with or obstruct implementation of the applicable air quality plan.	No mitigation.	No mitigation applies. The air quality plan applicable to the Project area is the 2016 AQMP. The 2016 AQMP is the SCAQMD plan for improving regional air quality in the Basin. The 2016 AQMP is the current management plan for continued progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models. It also updates the federally approved 8-hour O3 control plan with new commitments for short-term NO_X and VOC reductions. The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

		As demonstrated in the following analyses, the Project would not result in significant regional emissions. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour PM2.5 NAAQS for the Basin. Directly applicable to the Project, the 2016 AQMP proposes robust NOX reductions from commercial appliances and commercial space heating. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP. The Project Site is classified as "Community Commercial" in the General Plan Framework and the Community Plan, a classification that allows residential, retail, and restaurant uses by right. As such, the RTP/SCS' assumptions about growth in the City accommodate job growth on this site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2016 RTP/SCS and 2016 AQMP.
AIR-2: Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.	**MM-AIR-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable	The Project will conform to this SCAG mitigation measure. The City will require the existing regulatory measures listed below on the Project that have been identified by CARB and the South Coast Air Quality Management District (SCAQMD) to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible. The existing regulatory measures listed below would apply to the Project and are equal to or more effective than **SCAG MM-AIR-2(b).** The Project is required to comply with applicable standards of the CARB and SCAQMD, including the following rules:

	and feasible. CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions: • Minimize land disturbance. • Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. • Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. • Cover trucks when hauling dirt. • Stabilize the surface of dirt piles if not removed immediately. • Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. • Minimize unnecessary vehicular and machinery activities. • Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. • On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17- Watering, and 18-Dust Palliative shall be incorporated into project specifications. • Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. • Prepare a plan for approval by the applicable air district	• CARB Anti-Idling Air Toxics Control Measure: This measure, codified in Title 13 California Code of Regulations (CCR) Section 2485, applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time, with certain exception for vehicles where idling is a necessary performance activity such as for concrete trucks. • Rule 401 – Visible Emissions: This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view. • Rule 402 – Nuisance: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. • Rule 403 – Fugitive Dust: This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.

- Ensure that all construction equipment is properly tuned and maintained.
- Provide an operational water truck onsite at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators.
- Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.
- As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.
- Implement EPA's National Clean Diesel Program.
- Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered

- Rule 1113 – Architectural Coatings: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations: This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Calculation worksheets, assumptions, and model outputs used in the analysis are included in **Appendix G: Air Quality Modeling**.

As shown in **Table 4-1,** the construction of the Project will produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional or local thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional or pollutants (e.g., ozone).

Table 4-1
Estimated Daily Construction Daily Emissions - Unmitigated

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2020	4	75	25	<1	6	3
2021	3	18	20	<1	2	1
2022	21	23	29	<1	2	1
Maximum Regional Total	**21**	**75**	**29**	**<1**	**6**	**3**
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

equipment if electric infeasible.

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

Maximum Localized Total	**21**	**21**	**15**	**<1**	**4**	**2**
Localized Threshold	**--**	**74**	**680**	**--**	**5**	**3**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)
Source: DKA Planning, 2019 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area.

As shown in **Table 4-2**, the Project would not exceed the SCAQMD's regional or localized significance thresholds. The Project operational impacts on long-term air pollution would be considered less than significant.

Table 4-2
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	4	<1	14	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	2	9	26	<1	8	2
Gross Regional Total	6	10	40	<1	8	2
Existing Regional Total	-1	-3	-5	-<1	-1	-<1

- Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3-minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit.
- Prohibit diesel idling within 1,000 feet of sensitive receptors.
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- The engine size of construction equipment shall be the minimum practical size.
- Catalytic converters shall be installed on gasoline-powered equipment.
- Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit.
- Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite.
- Use new or rebuilt equipment.
- Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated.
- Use low rolling resistance tires on long haul class 8 tractor-trailers.

Net Regional Total	**5**	**7**	**35**	**<1**	**7**	**2**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	**12**	**2**	**41**	**<1**	**<1**	**<1**
Localized Significance Threshold	**N/A**	**108**	**1,048**	**N/A**	**2**	**2**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: DKA Planning, 2019 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area.

Additionally, as discussed under Transportation, Traffic, and Safety, the Project will be required as a condition of approval to implement a Construction Management Plan. The Plan requires that the contractor to schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets and schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.

With implementation of CARB and SCAQMD rules, the Project would minimize construction emissions and would therefore be substantially in conformance with **SCAG MM-AIR-2(b)**.

	• Suspend all construction activities that generate air pollutant emissions during air alerts. • Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.	
AIR-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable NAAQS or CAAQS.	No mitigation.	No mitigation applies.
AIR-4: Expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially.	**MM-AIR-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects will be located. Where the Lead Agency has identified that a project has the potential to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s), or other comparable measures, to reduce cancer risk pursuant to the Air Toxics "Hot Spots" Act of 1987 (AB2588), as applicable and feasible. Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB's strategy includes the following elements: • Set technology forcing new engine standards. • Reduce emissions from the in-use fleet. • Require clean fuels, and reduce petroleum dependency. • Work with US EPA to reduce emissions from federal	This mitigation measure does not apply to the Project, because the Project does not involve a 2016-2040 RTP/SCS transportation project. As a mixed-use development, the Project cannot establish new regulatory standards or requirements, such as setting new engine standards or making improvements and enhancements to California's Smog Check Program.

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

	– New Emission Standards for Recreational Boats – Off-Road Recreational Vehicle Expanded Emission Standards	
AIR-5: Expose a substantial number of people to objectionable odors.	No mitigation.	No mitigation applies.
Biological Resources		
BIO-1: Potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	**MM-BIO-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Sections 7, 9, and 10(a) of the federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, as applicable and feasible. Additional compliance should adhere to applicable implementing regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California Department of Fish and Wildlife. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. • Where avoidance is determined to be infeasible,	The Project is located in a developed, urban area and will be replacing existing land uses. The Project would not be developed on open space. 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 or U.S. Fish and Wildlife Service, 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 does not apply.

	provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an Incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to protect the survival and recovery in the wild of federally and state-listed endangered species including the bald eagle: o Avoidance strategies o Contribution of in-lieu fees o Use of mitigation bank credits o Funding of research and recovery efforts o Habitat restoration o Conservation easements o Permanent dedication of habitat o Other comparable measures • Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. • Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. • Appoint an Environmental Inspector to monitor implementation of mitigation measures. • Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.	

	• Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance. • Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
BIO-2: Potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations; or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	**MM-BIO-1(b).** **MM-BIO-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on state-designated sensitive habitats, including riparian habitats, that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 1600 of the State Fish and Game Code, USFS Land Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino, implementing regulations for the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other related federal, state, and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded	The Project is located in a developed, urban area and will be replacing existing land uses. The Project would not be developed on existing open space. Therefore, development of the Project would not result in adverse effects to any riparian habitat or other sensitive habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Therefore, these mitigation measures do not apply.

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

	of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate. • Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. • Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats. • Install fencing and/or mark sensitive habitat to be avoided during construction activities. • Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area. • Revegetate with appropriate native vegetation following the completion of construction activities. • Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). • Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
BIO-3: Potential to have a substantial adverse effect on federally protected	**MM-BIO-1(b)** and **MM-BIO-2(b).** **MM-BIO-3(b):** Consistent with the provisions of Section	These mitigation measures do not apply to the Project, because the Project Site is not located on protected wetlands or water features

wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 404 of the Clean Water Act and regulations of the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. • Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB). • Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as	that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies.

	possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: – Permittee-responsible mitigation – Contribution of in-lieu fees – Use of mitigation bank credits • Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affected and, if necessary, perform a formal wetland delineation.	
BIO-4: Potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	**MM-BIO-1(b), MM-BIO-2(b),** and **MM-BIO3(b).** **MM-BIO-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead	The Project is located in a developed, urban area and will be replacing existing commercial development (medical office and restaurant). The Project would not be developed on existing open space. The Project will be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulations, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur.

	Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and polices of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur. • Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement. • Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. • Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible. • Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area	

	from February 1 through August 31. • Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. • Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. • Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and offsite. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDB by a qualified biologist to determine the risk of habitat fragmentation. • Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). • Demonstrate that proposed projects would not adversely affect movement of any native resident or	

	migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible. • Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern. • Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction • Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas. • Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in **MM-BIO-1(b)**, where applicable: – 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 • 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. • Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species. • Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.	
BIO-5: Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation	**MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b),** and **MM-BIO-4(b).** **MM-BIO-5(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified	The Project is located in a developed, urban area and will be replacing existing commercial development. The Project would not be developed on existing open space.

policy or ordinance.	mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. • Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist. • If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species. • Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other	Furthermore, the Project will be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulations, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. The Site contains 14 street trees (4 on Sunset, 10 on Reservoir), and none onsite. None of the trees are protected species.[1] The trees will be within the construction site and impact the ability to build the building to the property line as planned. Any tree removal will comply with the City's Tree Replacement Program (Urban Forestry Division, Bureau of Street Services for the street tree). Thus development of the Project will not conflict with any local policies or ordinances protecting biological resources and these mitigation measures do not apply.

[1] Street Tree Report, Arborgate Consulting, Inc., April 9, 2019.

	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. • Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. • Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. • Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration. • If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that	

	is removed. • Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. • Design projects to avoid conflicts with local policies and ordinances protecting biological resources. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: – Avoidance strategies – Contribution of in-lieu fees – Planting of replacement trees at a minimum ratio of 2:1 – Re-landscaping areas with native vegetation post-construction	
BIO 6: Potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	See **MM-BIO-1(b), MM-BIO-2(b), MM-BIO3(b), MM-BIO-4(b),** and **MM-BIO-5(b).** **MM-BIO-6(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California	The Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Therefore, these mitigation measures do not apply.

	Endangered Species Act; and implementing regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. • Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in MM-BIO-1(b), where applicable.	
Cultural Resources		
CUL-1: Potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features.	**MM-CUL-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA	The Project conforms to this mitigation measure, as the Project will be required as a condition of approval to implement the mitigation measures contained in **SCAG MM-CUL-1(b).**

	Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: – Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. – Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources. – Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible: – All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. – Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction.	

	If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP. – Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. – Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas. • Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance. • Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.	
CUL-2: Potential to cause a substantial adverse change in the significance of a historical resource, including tribal cultural resources, as defined in CEQA Guidelines Section 15064.5.	**MM-CUL-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding	As discussed in Section 2 of this SCPE, the Project will not cause a substantial adverse change in the significance of Taix French Restaurant as an historical resource pursuant to Section 21084.1 of CEQA. Based on the record of proceedings in the Historic-Cultural Monument proceedings and the GPA report, the lead agency makes the following determinations: (a) the historic-cultural significance of Taix Restaurant is in its continuity and value as a legacy business, rather than in the

	or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified. • Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. • Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: – 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,	restaurant's current physical premises; (b) substantial evidence demonstrates that a legacy business may be considered a historic resource apart from its physical premises; (c) the question of how best to support the survival and continuation of legacy businesses, such as Taix Restaurant, and thereby preserve them as historic-cultural resources, presents unique issues that must be evaluated on a case-by-case basis; (d) the premises of Taix French Restaurant do not constitute its significance as a historical resource and their demolition will not materially impair the significance of Taix French Restaurant as a historical resource; (e) approval of the Transit Priority Project will enable the preservation of Taix French Restaurant as a historical resource by avoiding its permanent closure and providing a new facility, sized to meet the current needs of Taix French Restaurant and designed by the Taix family, with upgraded and code compliant infrastructure, outdoor dining, which the Taix family has determined will be financially viable to operate in terms of its size and format; (f) disapproval of the Transit Priority Project would result in significant and unavoidable adverse impacts to Taix French Restaurant as a historical resource because it would result in the permanent closure of the restaurant and thus the permanent loss of the historical resource; and (g) Taix French Restaurant is designated as a City of Los Angeles Historic-Cultural Monument and, as a historically significant legacy business, will remain eligible for inclusion in the California Register of Historical Resources after the Transit Priority Project is implemented. As discussed in Section 2 of this SCPE, the Project will not: (i) Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or

	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 will 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. • Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource. • Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site. • Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified. • Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.	eligibility for, inclusion in the California Register of Historical Resources; (ii) Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code; or (iii) Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources. As recommended by the GPA Historic Resource Report to protect the billboard, cocktails sign, and cherry wood bar features identified by the lead agency as conveying its historic significance, the Project will be required as a condition of approval to implement the following Performance Standard: **Performance Standard HISTORIC-1:** • Prior to the development of final construction plans, the applicant shall ensure a historic preservation professional meeting the qualifications for architectural history or historic architecture outlined in Title 36 of the Code of Federal Regulations, Part 61 has reviewed and confirmed: ○ The three physical features (billboard, cocktails sign, and cherry wood bar) are clearly and properly identified on the demolition plans; ○ The demolition plans include detailed notes for careful removal and protection of the three physical features. ○ The construction plans include detailed drawings for reinstallation of the features in a manner that

	• If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. • Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated. • Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.	would not damage or destroy them or put them at risk of damage in the future. • The applicant shall identify an appropriate climate-controlled and locked storage location for the three physical features (billboard, cocktails sign, and cherry wood bar) during construction that will prevent damage, vandalism, or theft. The applicant shall also identify an appropriate method to safely transport the features to this location. The location and transportation information shall be provided to a historic preservation professional meeting the qualifications for architectural history or historic architecture outlined in Title 36 of the Code of Federal Regulations, Part 61 to review and confirm. • The applicant shall conduct a training for the construction team to ensure all workers that will be on the site are aware of the physical features, their significance, and their need for protection. • Prior to the commencement of demolition of the buildings on the site, the applicant shall retain a qualified contractor or practitioner experienced with historic buildings and historic building elements to carefully remove the three physical features (billboard, cocktails sign, and cherry wood bar) from their existing locations prior to construction of the proposed Project. • Following the completion of the proposed construction, the applicant shall retain a qualified contractor or practitioner experienced with historic buildings and historic building elements to install the three physical features (billboard, cocktails sign, and cherry wood bar) in their proposed new locations in a manner that does not damage or destroy the features or put them at risk of damage in the future. Regarding archaeological and tribal resources, the Project will comply with the requirements of California PRC Section 21083.2. In the event archaeological resources are exposed during Project

		construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment in conformance with California PRC Section 21083.2. However, construction activities could continue in other areas of the Project Site. Compliance with these requirements would ensure that impacts to archaeological resources are less than significant.
CUL-3: Potential to cause a substantial adverse change in the significance of an archaeological resource, including tribal cultural resources, pursuant to CEQA Guidelines Section 15064.5.	See **MM-CUL-2(b).**	Regarding archaeological and tribal resources, the Project will comply with the requirements of California Public Resources Code Section 21083.2. This would avoid a substantial adverse change in the significance of an archaeological resources including tribal cultural resources.
CUL-4: Potential to disturb human remains, including those interred outside of formal cemeteries, including Native American Sacred Sites.	**MM-CUL-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060 and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a	The Project substantially conforms to this mitigation measure. The existing regulatory requirements listed below regarding discovery of human remains would apply to the Project and are equal to or more effective than the **SCAG MM-CUL-4(b).** In accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Site, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her

	dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. • If any discovered remains are of Native American origin: – Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. – If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: o The Native American Heritage Commission is unable to identify a descendent; o The descendant identified fails to make a recommendation; or o The landowner or their authorized	authorized representative, in the manner provided in PRC Section 5097.98. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Through compliance with this regulation, potential Project impacts to human remains will be less than significant.

	representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.	
Energy		
EN-1: Potential to increase petroleum and nonrenewable fuel consumption in the regional transportation system.	No mitigation.	No mitigation applies.
EN-2: Potential to increase residential energy consumption use.	**MM-EN-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including: – Use energy efficient materials in building design, construction, rehabilitation, and retrofit. – Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. – Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for	The Project substantially conforms to **SCAG MM-EN-2(b)** as it will be required to comply with California Building Code Title 24. As discussed in **Appendix F: Energy and Water Efficiency Compliance Report**, the Project will meet the requirements of PRC Section 21155.1(a)(8) for a Sustainable Communities Project in that it will be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region. The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, high performance building envelop walls, roof, and floor, glazing windows, reduction of lighting power density with the use of high-efficacy LED lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems heat-pumps with SEER (seasonal energy efficiency ratio) =16 or higher, and centralized domestic hot water system with 95% thermal efficiency and a 50% solar thermal system. The efficiency measures result in 17.3 percent less energy than Title 24 requirements. The Project would utilize low flow water fixtures that achieves and exceeds the City of Los Angeles' water conservation goals. This was achieved with features such as energy star appliances for dishwasher and clothes washers, low flow faucets and fixtures (see table for targets), water-saving pool features (pool covers), water efficient drip irrigation systems and weather based-controllers-and

	shade, and sunlight. – Incorporate passive environmental control systems that account for the characteristics of the natural environment. – Use high-efficiency lighting and cooking devices. – Incorporate passive solar design. – Use high-reflectivity building materials and multiple glazing. – Prohibit gas-powered landscape maintenance equipment. – Install electric vehicle charging stations. – Reduce wood burning stoves or fireplaces. – Provide bike lanes accessibility and parking at residential developments.	drought-tolerant native plantings for landscaping. The water savings features results in a 73.9 percent water savings than the regional average household water use. To ensure compliance with the assumptions of the Energy and Water Efficiency Compliance Report, the Project will be required to implement the following a condition of approval: • The Project shall comply with the energy efficiency and water efficiency measures listed in the Energy and Water Efficiency Compliance Report.
EN-3: Potential to increase building energy consumption in anticipated development.	**MM-EN-2(b).**	As discussed above the Project will meet the requirements of PRC Section 21155.1(a)(8) for a Sustainable Communities Project in that it will be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards. The Project will also be required to comply with the City's Green Building Code Title 24, which incorporates the requirements of CALGreen.
EN-4: Potential to increase water consumption and energy use related to water in anticipated development.	No mitigation.	No mitigation applies. As discussed above the Project will meet the requirements of PRC Section 21155.1(a)(8) for a Sustainable Communities Project in that it will be designed to be at least 25 percent less water than average household use in the region. The Project will also be required to comply with the City's Green Building Code Title 24, which incorporates the requirements of CALGreen.
Geology and Soils		
GEO-1: Potential to expose people or structures to potential substantial adverse	**MM-GEO-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in	The Project is located in the seismically active region of Southern California, and is susceptible to ground shaking during a seismic event. A Geotechnical Investigation was conducted for the Project Site (**Appendix E: Geotechnical Investigation**). The Project Site

effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic related ground-failure, including liquefaction; (iv) landslides.	the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault. • Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC. • Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas.	is not located within a delineated earthquake fault zone, but is located within an area mapped as a Liquefaction Zone. The Project Site is not located within a delineated earthquake fault zone, but is located within an area mapped as a Liquefaction Zone. The Project substantially conforms to this mitigation measure, because the Project will be required to comply with the existing building regulations associated with the City of Los Angeles Building Code, which incorporates the Uniform Building Code (UBC) and 2016 California Building Code (CBC), which contain provisions to mitigate the risk of an earthquake fault or seismic hazard zone. The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards. Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, earthquake safety. Conformance with the 2016 CBC requirements would reduce the potential for structures on the Project Site to sustain damage during an earthquake event, and would ensure that the Project would not expose people or structures to substantial adverse effects associated with seismic ground-shaking to any greater extent than other properties in the Southern California region. The Project conforms to the requirements of PRC Section 21151.5(a)(6) in that it is not subject to flood plain, flood way, or restricted zone hazards. The proposed Project would include housing, but would not be located in a 100-year flood hazard area, according to the Los Angeles Safety Element.

	• Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. • Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.	According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the Project Site are located outside of any Special Flood Hazard Areas (SFHAs). Further, the Project Site is not located with a potential inundation area, being located outside of the inundation area for the Silver Lake Reservoir. Additionally, there are no levees or dams in the Project vicinity. Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, would occur.
GEO-2: Potential to result in substantial soil erosion or the loss of topsoil.	**MM-GEO-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department	The Project substantially conforms to **SCAG MM-GEO-2(b)** as it will be required to comply with the City's Low Impact Development Ordinance. The Project Site is currently developed with buildings and paved surfaces. The Project will 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

	Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: – File a Notice of Intent (NOI) with the SWRCB. – 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. – Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the	water quality (including erosion and sedimentation issues) impacts, and will be required to obtain a Storm Water Pollution Prevention Plans (SWPPP) from the Regional Water Quality Control Board. The Project will also be required to comply with grading, excavation, and foundation permits or approvals from the City of Los Angeles which would include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. The Low Impact Development (LID) Ordinance became effective on May 12, 2012. The LID Ordinance is a stormwater management strategy with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. The LID Ordinance promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate, detain, and/or treat runoff may be used. The Bureau of Sanitation (BOS), Watershed Protection Division adopted the LID standards as issued by the LARWQCB and the City Department of Public Works. The LID Ordinance conforms to the regulations outlined in the NPDES Permit and SUSMP. LID design standards require Best Management Practice (BMP) so that the source and treatment control must be sufficiently designed and constructed to collectively treat, infiltrate, or filter stormwater runoff from one of the following: • The 85th percentile 24-hour runoff event determined as the maximized capture stormwater volume for the area, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998); • The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in California Stormwater Best

	commencement of construction and continue through the completion of the project. – After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB. • Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	Management Practices Handbook—Industrial/Commercial, (1993); • The volume of runoff produced from a 0.75-inch storm event, prior to its discharge to a stormwater conveyance system; or • The volume of runoff produced from a historical-record based reference 24-hour rainfall criterion for "treatment" (0.75-inch average for the County area) that achieves approximately the same reduction in pollutant loads achieved by the 85th percentile 24-hour runoff event. The LID Ordinance is administered by City through the plan check process.
GEO-3: Potential to be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	**MM-GEO-1(b).**	The Project substantially conforms to this mitigation measure. Consistent with the CBC and the City of Los Angeles Department of Building and Safety, requirements, a Geotechnical Investigation was conducted for the Project Site (**Appendix E: Geotechnical Investigation**). The Geotechnical Investigation evaluated the nature, distribution, and engineering properties of the earth materials underlying the Project Site with respect to the design and construction of the Project. As part of the Geotechnical Investigation, three exploratory borings were excavated into the ground to collect representative soil samples that underlie the Project Site. The borings encountered shallow undocumented fill soils to depths of approximately 5 feet or less in our exploratory borings. The fill soils consisted of silts and clays. Moisture contents of the fills were observed to generally be moist. The underlying natural materials encountered consist of shale bedrock. The shale is very stiff to hard and very moist to wet. The bedrock materials

		anticipated to occur below the mat foundation exhibit very low compressibility and high strength characteristics. The Project is located in the seismically active region of Southern California, and is susceptible to ground shaking during a seismic event. The Project Site is not located within a delineated earthquake fault zone, but is located within an area mapped as a Liquefaction Zone. The Project Site is not located within a delineated earthquake fault zone, but is located within an area mapped as a Liquefaction Zone. The Project substantially conforms to this mitigation measure because the Project will be required to comply with the existing building regulations associated with the City of Los Angeles Building Code, which incorporates the Uniform Building Code (UBC) and 2016 California Building Code (CBC), which contain provisions to mitigate the risk of an earthquake fault or seismic hazard zone. Based on the results of the geotechnical investigation, from a geotechnical viewpoint it is feasible to develop the site as proposed.
GEO-4: Potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	**MM-GEO-1(b).**	The Project substantially conforms to this mitigation measure. Consistent with the CBC and the City of Los Angeles Department of Building and Safety, requirements, a Geotechnical Investigation was conducted for the Project Site (**Appendix E: Geotechnical Investigation**). The Project's onsite geologic materials have an Expansion Index of 90 (Medium). Pursuant to existing law and applicable regulations, design and construction of the Project will be required to incorporate measures to protect against risks associated with expansive soils. These measures include compliance with the City of Los Angeles Building Code, the Rules of General Application of the Grading Division of the LADBS, the City's building permit requirements, and site-specific engineering recommendations based upon the recommendations of a licensed geotechnical engineer, a geotechnical report approved by the LADBS. These mandatory requirements would minimize risks related to expansive soils.
GEO-5: Potential to have soils incapable of adequately supporting the use of septic tanks or	No mitigation.	No mitigation applies.

alternative waste water disposal systems where sewers are not available for the disposal of waste water.		
Greenhouse Gas Emissions and Climate Change		
GHG-1: Potential to directly or indirectly result in an increase in GHG emissions compared to existing conditions (2015).	No mitigation.	No mitigation required. The Project is consistent with the SCAG 2016-2040 RTP/SCS, which has been certified by the Air Resources Board as meeting regional GHG reduction targets.
GHG-2: Potential to conflict with SB 375 GHG Emission Reduction Targets.	No mitigation.	No mitigation required. The Project is consistent with the SCAG 2016-2040 RTP/SCS, which has been certified by the Air Resources Board as achieving regional GHG reduction targets.
GHG-3: Potential to conflict with AB 32 and or any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.	No mitigation.	No mitigation required. The Project is consistent with the SCAG 2016-2040 RTP/SCS, which has been certified by the Air Resources Board as achieving regional GHG reduction targets.
GHG Cumulative Impacts	**MM-GHG-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, the Lead Agency can and should consider mitigation measures to mitigate the significant	As discussed above, the Project will meet the requirements of PRC Section 21155.1(a)(8) for a Sustainable Communities Project in that it will be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region. AB 32 mandates that the California Air Resources Board (CARB) establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In 2008, CARB approved the original *Climate Change Scoping Plan* as required by AB 32.[2]

[2] Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.

	effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region as set forth below, or through comparable measures identified by Lead Agency: • Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. • Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. • Off-site measures to mitigate a project's emissions. • Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: – Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction; – Use alternative (non-petroleum based) fuels; – Deployment of zero- and/or near zero emission technologies as defined by CARB; – Use lighting systems that are energy efficient, such as LED technology; – Use the minimum feasible amount of GHG-emitting	Subsequently, CARB approved updates to the *Climate Change Scoping Plan in 2014 (First Update) and 2017 (2017 Update)*, with the *2017 Update* considering SB 32 (adopted in 2016) in addition to AB 32. the analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. The Project is consistent with CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The Project is consistent with the 2016–2040 RTP/SCS' plans, policies, and regulatory requirements to reduce regional GHG emissions from the land use and transportation sectors. In addition, the Project would comply with the LA Green Plan, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. As shown in **Appendix H-1: Transportation Impact Analysis**), based on the VMT analysis, the Project is anticipated to have a significant impact based on its residential component (daily household VMT per capita). Thus, additional TDM strategies beyond those included as Project features were explored to reduce the Project's daily household VMT per capita (8.8) below the East Los Angeles APC significance threshold for daily household VMT per capita (7.2). The Project proposes to: (1) reduce the Project parking supply from the City Municipal Code requirement of 300 parking spaces (per Municipal Code Section 12.21.A4) to 220 parking spaces, and (2) integrate unbundled parking as part of the development, thereby separating the cost of renting a residential dwelling unit from the cost to rent a parking space.

	construction materials that is feasible; – Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production; – Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse; – Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy; – Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption; – Use lighter-colored pavement where feasible; – Recycle construction debris to maximum extent feasible; – Protect and plant shade trees in or near construction projects where feasible; and – Solicit bids that include concepts listed above. • Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles. • Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network. • Improving transit access to rail and bus routes by	Applying the reduced parking supply strategy and unbundled parking strategy (with an assumed monthly parking space cost of $150), the VMT Calculator determined that the Project would generate the following with-mitigation trip estimates: 894 daily vehicle trips and 5,130 daily VMT. Based on the 5,130 daily VMT, the VMT Calculator determined that the Project would generate 6.3 daily household VMT per capita. This value falls below the East Los Angeles APC area threshold of significance of 7.2 daily household VMT per capita. Therefore, the provision of a reduced parking supply and unbundled parking would reduce the Project's daily household VMT per capita to a less-than-significant level.

	incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations. • Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs. • Designate a percentage of parking spaces for ride-sharing vehicles or highoccupancy vehicles, and provide adequate passenger loading and unloading for those vehicles. • Land use siting and design measures that reduce GHG emissions, including: – Developing on infill and brownfields sites; – Building high density and mixed use developments near transit; – Retaining on-site mature trees and vegetation, and planting new canopy trees; – 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 – Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.	
Hazards and Hazardous Materials		
HAZ-1: Potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal	**MM-HAZ-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction	The Project substantially conforms to this mitigation measure. Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include the future residents of the Project and the nearby residential land uses. The types and amounts of hazardous materials that will be used in connection with the Project will be

of hazardous materials.	and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. • Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. • Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials. • Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project. • Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to	typical of those used in other mixed-use developments (e.g., cleaning solvents, pesticides for landscaping, and painting supplies). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials area reasonably anticipated to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk will be reduced through compliance with these standards and regulations. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts will be less than significant and no mitigation measures are required.

	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. – An emergency response plan including employee training information. – A plan that describes the manner in which these materials are handled, transported and disposed. • Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects. • Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. • Avoid overtopping construction equipment fuel gas tanks. • During routine maintenance of construction equipment, properly contain and remove grease and oils. • Properly dispose of discarded containers of fuels and other chemicals.	
HAZ-2: Potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and	**MM-HAZ-1(b).**	As described above, under **HAZ-1**, the Project would substantially comply with **SCAG MM-HAZ-1(b)**. In addition, during construction, all potentially hazardous materials encountered and used at the Project Site will be used and stored in

accident conditions involving the release of hazardous materials into the environment.		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. A Phase I Environmental Site Assessment (ESA) and a Phase II ESA for the Project was prepared (**Appendix C-1: Phase I Environmental Site Assessment** and **Appendix C-2: Phase II Environmental Site Assessment**). The Phase I ESA did not identify a Recognized Environmental Condition (REC), a Historic REC, or a Controlled REC. The Phase I identified the following business environmental risks: • The review of regional environmental conditions indicates that the property immediately adjacent to the Site on the east was occupied by a gasoline service station and/or an automotive repair facility from the 1920s through the 1970s. Although there are no documented releases at the service station property, the long history of chemical use and the close proximity of the property indicate a potential for impacts to soil, soil vapor, or groundwater quality at the Site. • The review also indicates the presence of a significant gasoline release at an off-Site property located about 275 feet southwest (cross-gradient) of the Site. The high levels of contamination (up to six feet of LNAPL [light non-aqueous phase liquid]) and the absence of full down-gradient evaluation of the extent of contamination from the Site indicates a potential for impacts to soil vapor or groundwater quality at the Site. • A laundry facility was historically present on the Site in the 1940s. No documented hazardous chemical use or release has been identified at the facility. The historic Site occupancy by a laundry facility represents a potential risk of impact to soil, soil vapor, or groundwater quality at the Site; however, the results of the Phase II ESA indicated that there does not appear to be a soil vapor issue associated with historical laundry (or any

		other uses) on the Site. Given the redevelopment plans for the Site, Northgate conducted a concurrent Phase II ESA to evaluate potential impacts to soil and soil vapor related to the identified business environmental risks. The VOC results indicate that there does not appear to be a soil vapor issue associated with historical laundry or other uses on the Site; however, the 1,1,2-TCA and ethylbenzene could be related to the former automotive maintenance facility to the east of the Site or the current gas station to the west of the Site. Given the presence of arsenic and lead in one soil boring (boring B5) exceeding regulatory screening criteria, Northgate recommends the following: • Assessment of the lateral and vertical extent of lead in soil at boring B5 above hazardous waste criteria prior to excavation; • Develop a soil management plan to address the management of the lead impacted soil, the potential segregation of "landfill cover" soil from "unrestricted use soil," and management of any potentially impacted soil that might be encountered during excavation; • Based on soil vapor data, plan on vapor mitigation or assess soil vapor beneath the restaurant building when it becomes accessible; and • Properly remove and dispose any impacted soil encountered during development. As recommended by the Phase II, the Project will be required as a condition of approval to implement the following performance standard: **Performance Standard HAZARD-1:** A Soil Management Plan (SMP) shall be prepared that addresses the management of the lead impacted soil, the potential segregation of "landfill cover" soil from "unrestricted use soil," and management of any potentially impacted soil that might be encountered during excavation.

		The SMP would assess the lateral and vertical extent of lead in soil at boring B5. Based on the soil vapor data, a vapor mitigation (in accordance with LAMC and EPA requirements for vapor intrusion into indoor air spaces) may be required underneath the restaurant building when it becomes accessible. These procedures would include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and properly removal and disposal procedures. The SMP would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. This mitigation will ensure that the effects of the potential exposure will be mitigated to a level of less than significance in compliance with state and federal requirements. An asbestos-containing materials (ACM) and lead-based-paint (LBP) survey was conducted for the Project buildings (**Appendix C-3: ACM and LBP Survey for 1911 Sunset** and **Appendix C-4: ACM and LBP Survey for 1931 Sunset**). The surveys found ACM and LBP in the 1911 Sunset building (restaurant) and ACM in the 1931 building (medical office). The identified asbestos will be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations. The identified LBP will be abated in accordance with applicable City, State, and federal regulations. The Project will be a residential and commercial restaurant use, which are not hazardous-producing uses. Therefore, potential risks to residents, visitors, and employees on the Project Site will be minimal during operation of the Project.
HAZ-3: Potential to emit hazardous emissions or handle hazardous or acutely hazardous	**MM-HAZ-1(b).**	As described above, under **HAZ-1**, the Project would substantially comply with **MM-HAZ-1(b)**. In addition, during construction and operation, the Project would not emit or handle hazardous materials

materials, substances, or waste within one quarter mile of an existing or proposed school.		or substances other than those typically used in other mixed-use residential and commercial developments.
HAZ-4: Potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	**MM-HAZ-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines; SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Cleanup Act, and the Uniform Building Code, and County and City building standards, and all applicable federal, state, and local laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. • Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a	As part of the Phase I ESA, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. 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 sites or facilities at the Project Site were listed in the databases. Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment, and, this mitigation measure does not apply. The Project would use best management practices (BMPs) and **Performance Standard HAZARD-1** regarding potential soil hazards. Potential risks to residents, visitors, and employees on the Project Site will be minimal during operation of the Project. To further minimize risks associated with ACMs and LBP any identified asbestos will be abated in accordance with the South Coast Air Quality Management District (SCAQMD)’s rule 1403, as well as other applicable City, State, and federal regulations. In addition, any identified LBP will be abated in accordance with applicable City, State, and federal regulations. The Project would include a commitment to the preparation and enforcement of a SMP that would provide safety guidance and protocols for contractors of potentially impacted soils or groundwater that may be encountered at the Project Site during construction. The commitment of the SMP will be included in the Conditions of Approval for the Project.

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

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

	(RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. • Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. • If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations. • Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. • Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17	

	CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. • Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
HAZ-5: Potential for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.	No mitigation.	No mitigation applies.
HAZ-6: Potential for a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.	No mitigation.	No mitigation applies.
HAZ-7: Potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation	**MM-TRA-5(b).**	The Project substantially conforms to this mitigation measure. The Project would not result in any significant traffic impacts. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan

plan.		will be submitted to LADOT during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways will be impeded. Access for emergency service providers and any evacuation routes will be maintained during construction and operation. Therefore, impacts will be less than significant and no mitigation measures are required.
HAZ-8: Potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	**MM-HAZ-8(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures will be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers. • Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training,	This mitigation measure does not apply to the Project because the Project Site is located in a fully urbanized area and there are no wildlands in the vicinity, and is not near a wildland fire hazard. Furthermore, the Project is subject to adherence to Fire Code requirements, such as submitting a fire safety plan to the Lead Agency and local fire agency for their review and approval.

	sustainable development, brush management, and public outreach. • Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, low growth habits, ignition-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat. • Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of nonnative, invasive species to promote healthy, natural ecosystem regrowth. • Native vegetation is more likely to have deep root systems that prevent slope failure and erosion of burned areas than shallow-rooted non-natives. • Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase. • Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat. • Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts. • Encourage the use of fire-resistant materials when	

	constructing projects in areas with high fire threat.	
Hydrology and Water Quality		
HYD-1: Potential to violate any water quality standards or waste discharge requirements.	**MM-HYD-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. • Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. • Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. • Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. • Ensure adequate capacity of the surrounding	The Project substantially conforms to this mitigation measure. The Project will comply with Los Angeles Municipal Code Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills and incorporate some of the text from below, such as: Storm Water Pollution Prevention Plans (SWPPP) are commonly associated with construction stormwater permits, which are issued by the Regional Water Quality Control Board. The Project Site lot area is approximately 43,896 square feet[3] (or 1.008 acres).As the Project is more than one acre, it does require a SWPPP. In addition, the Project's construction activities would require grading, excavation, and foundation permits or approvals from the City of Los Angeles which will include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. Prior to issuance of grading permits, the Applicant will be required to submit a Low Impact Development Plan to the City's Bureau of Sanitation Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development BMP Handbook. The Project will be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standard. LID design standards require Best Management Practice (BMP) so that the source and treatment control must be sufficiently designed and constructed to collectively treat, infiltrate, or filter stormwater runoff. The LID Ordinance is administered by City through the plan check process.

3 Plans, Togawa Smith Martin, Inc., August 2019.

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

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

	• Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. • Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible. • If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.	
HYD-2: Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there will be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).	**MM-HYD-2(b):** Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms with federal, state, regional, and local standards for sustainable management of groundwater	Continual dewatering during operation of the Project would not occur. Based on groundwater encountered in the explorations at the Project Site and directly across the street, as well as the nearest historical high groundwater depths, a design groundwater elevation of +401 feet (20 feet below existing grade along Reservoir Street) is appropriate for the project. The lower level of the subterranean parking will be water-proofed and designed to resist the hydrostatic pressures imposed by the design groundwater level if the lower level extend below this elevation.[4] The lowest level (P2) is expected to be 390.5 feet above sea level and will require the waterproofing in accordance with LADBS requirements. If necessary, construction-related dewatering, treatment, and disposal will be conducted in accordance with permitted requirements set forth by the LARWQCB's Waste Discharge

4 Geotechnical Investigation, February 1, 2019, page 5.

	basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. • Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges.
HYD-3: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site.	**MM-HYD-1(b).**	As described above under **HYD-1**, the Project substantially conforms to this mitigation measure. Furthermore, compliance with LAMC Chapter XI, Division 70 would ensure that the Project does not substantially alter the existing drainage pattern of the area surrounding the Project Site. LAMC Chapter IX, Division 70 addresses erosion control during grading, excavation, and fill activities, as well as the SUSMP, which addresses erosion control through peak-flow reduction and infiltration features. Therefore the impacts related to drainage pattern alteration and erosion will be less than significant.

HYD-4: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site.	**MM-HYD-1(b).**	As described above under **HYD-1**, the Project substantially conforms to this mitigation measure. There are no waterbodies within or near the Project Site, and therefore flooding is not expected to occur on- or off-site. The Echo Park Lake is approximately 1,000 feet shout of the Site and not listed as a potential inundation source, according to the City's Safety Element. Therefore the impacts related to drainage pattern alteration and flooding will be less than significant.
HYD-5: Potential to substantially create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff.	**MM-HYD-1(b).**	The Project will be subject to the provisions of the LID Ordinance. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that expand the review of the SUSMP discussed above. Incorporation of these features would minimize the stormwater runoff from the Project Site. It can be reasonably anticipated, then, that the existing storm drain system has adequate capacity to accommodate flows from the Project Site. Therefore, impacts will be less than significant and no mitigation measures are required.
HYD-6: Potential to otherwise substantially degrade water quality.	**MM-HYD-1(b).**	The Project substantially conforms to this mitigation measure, because the Project is required to implement regulatory requirements, thus, water quality impacts associated with construction and operation of the Project will be less than significant. No mitigation measures are required.
HYD-7: Potential to place housing within a 100- year flood hazard area as mapped on a federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map.	No mitigation.	No mitigation applies.
HYD-8: Potential to place within a 100-year flood	**MM-HYD-8(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified	The Project substantially conforms to this mitigation measure. FEMA's Flood Insurance Rate Map shows the Project Site is not

hazard area structures that would impede or redirect flood flows.	mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program. • Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	within a 100-year flood hazard area. Therefore, no impact would occur and no mitigation measures are required.
HYD-9: Potential to expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a	**MM-HYD-8(b).**	According to information provided by FEMA, the Project Site is not located in a 100-year flood area. Further, the Project Site is not located with a potential inundation area. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam and **SCAG MM-HYD-8(b)** would not apply.

levee or dam.		
HYD-10: Potential for inundation by seiche, tsunami, or mudflow.	**MM-HYD-8(b).**	The Project conforms to this mitigation measure. The Project Site is located approximately 14 miles east of the Pacific Ocean. Therefore, risks associated with seiches or tsunamis will be considered extremely low at the Project Site. The Project Site is not located in a Tsunami Hazard Area. The Project Site is located in an urbanized portion of the City of Los Angeles and is relatively flat. Thus, there is low potential for inundation by seiche, tsunami, or mudflow and **SCAG MM-HYD-8(b)** would not apply.
Land Use and Planning		
LU-1: Potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	**MM-LU-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency: • Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.	The Project Site has a General Plan Land Use Designation of Community. The Project Site's existing C2-1VL and [Q]C2-1VL zoning designations are consistent with this designation. The Project does not conflict with any applicable land use plan, policy, or regulation of the City of Los Angeles or any other agency with jurisdiction over the project. As discussed earlier, the Project is consistent with the 2016 RTP/SCS The Project will also implement the affordable housing policies of the City of Los Angeles. Based on its C2-1VL zoning designation, the Project Site's base density is 110 units. Based on the Project's proposal for 166 units, 21.8% of Project's base density (24 units) will be reserved for Very Low Income Households. The Project's off-menu density bonus request for the application of all RAS3 yard requirements to provide 5-foot setbacks within the two side yards in lieu of the otherwise required 11-foot setbacks pursuant to LAMC Section 12.11.C.2.; 25% reduced open space; and residential parking at a ratio of 0.5 spaces per dwelling unit. The Project off-menu density bonus request is to waive the 3-story limitation which applies to mixed-use buildings with a 1-VL Height District. The 3-story limitation was not adopted for the purpose of avoiding or mitigating an environmental effect. It is not required where a proposed project is entirely residential, and is not required for mixed-use RAS projects. The Project's requested off-menu density bonus incentives are necessary to provide for affordable housing costs and rents for the Project's affordable units, and will not have a Specific Adverse Impact upon public health or safety or

		on any real property that is listed in the California Register of Historical Resources.
LU-2: Potential to physically divide an established community.	**MM-LU-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consider alignments within or adjacent to existing public rights-of-way. • Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. • Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). • Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods. • Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:	The Project would not cause any permanent street closures or block access to any surrounding land use. Since the Project will be developed within a long-established developed area along an existing street grid system, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Thus, **SCAG MM-LU-2(b)** would not apply.

	– Alignment shifts to minimize the area affected. – 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. • Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project. • Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.	
LU-3: Potential to conflict with any applicable habitat conservation plan or natural community conservation plan.	See **MM-BIO-1(b), MM-BIO-2(b), MM-BIO3(b), MM-BIO-4(b), MM-BIO-5(b),** and **MMBIO-6(b).**	As described above under **BIO-6**, the Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Thus, **SCAG MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), MMBIO-5(b),** and **MM-BIO-6(b)** would not apply.
Mineral Resources		
MIN-1: Potential to result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state.	**MM-MIN-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that will be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan that are within the jurisdiction and responsibility of the California Department of	The Project Site is fully developed and no oil wells are present. There are no oil extraction operations and drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses. The Project is not using recycled materials or a substantial source of building materials such as concrete for other uses. Furthermore, as required by City Ordinance 181,519 (Waste Hauler Permit Program), Project construction waste will be hauled by

	Conservation, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with SMARA, California Department of Conservation regulations, local general plans, specific plans, and other laws and regulation governing mineral or aggregate resources, as applicable and feasible. Such measures may include the following, other comparable measures identified by the Lead Agency: • Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. • Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures: – Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. – 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. – 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	permitted haulers and taken only to City-certified construction and demolition (C&D) processing facilities that are monitored for compliance with recycling regulations. Given the Project's compliance with the required standards, the Project will be in compliance with **SCAG MM-MIN-1(b**).

	and during long-term operations. – 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.	**MM-MIN-1(b).**	There are no oil extraction operations and drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses. Therefore, development of the Project would not result in the loss of availability of a mineral resource that will 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, **SCAG MM-MIN-1(b)** would not apply.
Noise		
NOISE-1: Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	**MM-NOISE-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor's Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other comparable measures	The Project will be subject to the following City of Los Angeles noise requirements: • Compliance with the City's Noise Ordinance Nos. 144,331 and 161,574, which prohibit the emission or creation of noise beyond applicable levels (as described above) at adjacent uses unless technically infeasible. • Restricting the construction and demolition activities to the hours indicated in Section 41.40 of the LAMC (i.e., between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays). • Compliance with the City's Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction

	identified by the Lead Agency: • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance • Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including	allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety. Compliance with Section 112.02 of the LAMC for all new mechanical equipment, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB. Calculation worksheets, assumptions, and model outputs used in the analysis are included in **Appendix I: Noise Appendix**. The Project's on-site impacts from construction would be consistent with the City's municipal code requirements governing noise. Based on guidelines from the City of Los Angeles City Department of Planning, any on-site construction noise impact would be considered significant if: • Construction noise would exceed the 75 dBA at 50 feet maximum noise level limit for powered equipment established by Section 112.05 of the LAMC. This regulation applies to the on-site operations of powered construction equipment and not to road-legal trucks operating on public rights-of-way; Proposed construction would generate noise during the 23 months of building construction and application of architectural coatings. Noise-generating activities could occur between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. The Project would require heavy equipment such as excavators, loaders, and other earthmoving vehicles. Smaller equipment such as forklifts, generators, and powered hand tools would also be utilized.

construction hours, neighborhood notification, posted signs, etc.) are completed.

- Designate an on-site construction complaint and enforcement manager for the project.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, 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.
- Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible.
- Where feasible, eliminate noise-sensitive receptors by

Compliance with LAMC Section 112.05 would limit noise levels from powered construction equipment to 75 dBA or below at 50 feet, as the Project site is within 500 feet of residential zones. Standard, industry-wide best practices for construction in urban or otherwise noise-sensitive areas would ensure that construction noise does not exceed this noise limit. These could include erecting temporary noise barriers around the Project's perimeter, using mufflers to dampen noise from internal combustion engines, and warming-up or staging equipment away from sensitive receptors. As discussed earlier, the City of Los Angeles Department of Planning recommends that LAMC Section 112.05 be used as a threshold of significance for construction noise. Therefore, because the Project would comply fully with LAMC Section 112.05 by utilizing the types of equipment in **Table 4-3** that would employ best practices measures, its construction noise impact would be consistent with the Municipal Code. Impacts would be less than significant.

Table 4-3
Maximum Construction Noise Levels

Noise Source	Noise Level (dBA, L_{max})[1]		Significant ?
	Reference	With Best Practices	
Backhoe	77.6	57.6	No
Dozer	81.7	61.7	No
Excavator	80.7	60.7	No
Front End Loader	79.1	59.1	No
Gradall	83.4	63.4	No
Grader	85.0	65.0	No

[1] Noise levels derived from the Federal Highway Administration's Roadway Construction Noise Model, version 1.1 (FHWA RCNM 1.1). Assumes 10 dBA reduction from exhaust mufflers and 10 dBA reduction from temporary sound barriers.

Estimated Project construction noise levels at receptor locations were also modeled using the noise reference levels of both an

acquiring freeway and rail rights-of-way.

- Use noise barriers to protect sensitive receptors from excessive noise levels during construction.
- Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls.
- Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

excavator and loader working in tandem to represent the most conservative-scenario noise source during the construction phase. As shown in **Table 4-4**, noise levels from construction activities could reach as high as 74.4 dBA at the Edendale Branch Public Library directly west of the Project Site. As such, construction noise levels at these receptors would also be less than 75.0 dBA.

Table 4-4
Construction Noise Levels at Sensitive Receptors

Receptor Location	Estimated Noise Level (dBA, L_{eq})
1. Edendale Branch Public Library	74.4*
2. 2021 Reservoir Street residences	70.6
3. Hollywood Sunset Apartments	70.6
4. Logan Street Elementary School	35.9

Source: DKA Planning, 2019. Assumes 10 dBA reduction from exhaust mufflers, 10 dBA reduction from temporary sound barriers, and 10 feet of property line setback for an excavator and dozer to maintain maneuverability. Also assumes 2.5-meter (8.2 foot) high wall between Edendale Library and Project Site capable of 10 dBA attenuation.

Consistency with Municipal Code: Off-Site Construction Activities – Haul Trucks

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC.

The Project is expected to require up 5,625 round-trip haul trips to export soil to off-site landfills, assuming that trucks would have a 10 cubic yard capacity. Use of larger trucks would reduce the amount of truck traffic and the associated noise from operation of diesel fuel trucks running internal combustion engines.

		While a haul route has not been finalized, truck traffic to the eastbound Hollywood Freeway would most likely utilize southbound Park Avenue, a one-block local street, and southbound Glendale Boulevard, a four-lane major arterial that connects to the eastbound Hollywood Freeway. Trucks heading westbound on the Hollywood Freeway would most likely use westbound Sunset Boulevard to access southbound Alvarado Street, a four-lane major arterial that provides direct access to the Hollywood Freeway. Haul trucks would almost exclusively use arterials, bypassing local collector roads with quieter ambient noise levels that could be disturbed more than along major arterials. Haul trucks would generate occasional noise events at receptors during pass-bys, but such intermittent noise events would have a limited effect on ambient noise levels in the area for two key reasons. First, a doubling of vehicle trip volumes would generally be necessary to elevate ambient noise levels by 3 or more dBA, the threshold at which humans could notice a change in noise levels. As the Project is expected to require an average of 125 one-way haul truck trips per day (assuming 45 days of grading), these truck trips would access local arterials over the course of a potential seven-hour workday. Assuming each haul truck is the Passenger Car Equivalent (PCE) of 2.0 vehicles, haul trucks would add the equivalent of about 36 vehicle car trips to local arterials during the grading and excavation phase per peak hour (i.e., 18 haul truck trips x 2.0 vehicles/truck PCE).[5] If these trips were all taken using Glendale Boulevard, for example, they would represent an increase of 1.8 percent of the 2,012 vehicle trips on Glendale Boulevard south of Park Avenue during the peak morning hour.[6] This incremental 1.8 percent increase in traffic volumes would result in negligible, inaudible increases in concomitant traffic noise, far from the 100 percent increase needed to result in a 3 dBA increase in ambient noise levels. Further, elevated ambient noise levels along the Glendale Boulevard would make any increase in noise from haul truck traffic inaudible.

5 Transportation Research Board, Transportation Circular No. 212 and Exhibit 12-25 of Highway Capacity manual, 6th Edition.

6 Crain & Associates, Transportation Impact Study for the Proposed 1911 Sunset Boulevard Mixed-Use Project.

		As a result, the Project's off-site construction noise impact from haul trucks would be consistent with the Municipal Code. *Consistency with Municipal Code: Off-Site Construction Activities – Other Trucks* During construction of the Project, contractors and vendors would use trucks to deliver material to build and erect structures (e.g., concrete material, masonry, steel, metal, wood, plumbing supplies, electrical fixtures) would also travel to and from the Project site. These deliveries would involve various sized vehicles ranging from small delivery trucks to cement mixer trucks and 18-wheel trucks. Construction equipment would also have to be delivered to the site (e.g., dozers, excavators) using large trucks (e.g., 18-wheel trucks), though this would likely involve one-time delivery and removal of each piece of equipment over the course of the construction period. As with the hauling of excavated soils, these trips would incrementally add a minimal number of truck trips to Glendale Boulevard or Park Avenue. An average of 35 truck trips per day are projected during the building construction phase, resulting in an average of 70 PCE trips per day, ten of which could occur in the AM peak hour, for example. This increment of traffic from these delivery trucks would have negligible impacts on traffic volumes on Glendale Boulevard or Park Avenue and not double traffic volumes on these local roadways, thereby resulting in inaudible increases to ambient noise at the limited number of sensitive receptors that flank these streets. *Consistency with Municipal Code: Off-Site Construction Activities – Worker Commute Trips* During the course of the Project's construction phases, construction workers would travel to and from the Project site, particularly during the grading and building construction phases, the most labor intensive phases of construction. There could still be up to 82 workers commuting to and from the job site each day. If up to 82 trips were all added to Glendale Boulevard during the morning commute hour, for example, they would represent four percent of the 2,012 vehicle trips on Glendale Boulevard south of

		Park Avenue during the peak morning hour.[7] This incremental increase in traffic volumes would be far less than the 100 percent increase in traffic volumes needed to elevate ambient noise levels by 3 dBA and would result in negligible, inaudible increases in concomitant traffic noise along Glendale Boulevard Avenue and the limited number of sensitive receptors that flank the arterial. *Off-Site Construction Activities – Cumulative Impacts* When factoring in all three types of off-site construction activities (i.e., haul truck trips, delivery and other truck trips, and worker commute trips), up to 128 PCE trips could be added to Glendale Boulevard during the AM peak hour and 128 during the PM peak hour. This contribution of traffic would represent an increase of six percent on Glendale Boulevard, for example. This incremental increase in traffic volumes would be far less than the 100 percent increase in traffic volumes needed to elevate ambient noise levels by 3 dBA and would result in negligible, inaudible increases in concomitant traffic noise along Glendale Boulevard. As a result, the Project's off-site noise impact from construction activities would be considered less than significant. *Consistency of Operations Impacts with the Municipal Code* During operations, the Project would produce noise from both on- and off-site sources. On-site sources would include but not be limited to vehicle movement and parking, mechanical equipment, and other operational noise from the land uses proposed. Off-site sources would include but not be limited to traffic traveling to and from the Project site. As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance adopted by this

7 Crain & Associates, Transportation Impact Study for the Proposed 1911 Sunset Boulevard Mixed-Use Project.

analysis. As a result, the Project's on-site operational noise impacts would be considered less than significant.

The following criteria are used to assess the impact of the Project's operational noise sources that are located on the Project Site. A Project's operational noise impacts would be significant if:

- Project operations would cause a 5 dBA increase over the existing average ambient noise levels of an adjacent property (LAMC Section 111.02).[8],[9]

Consistency with Municipal Code: On-Site Operations

Mechanical Equipment. HVAC equipment would be located on the building's rooftop, where several dozen rooftop units (RTUs) would be set back throughout the roof, interspersed around proposed roof decks and terraces. Some of these RTUs would be located about 40 feet from the front property line along Sunset Boulevard, 20 feet from the eastern property line, 20 feet from the western property line near the public library, and 30 feet from the rear property line. This mechanical equipment would generate a sound pressure level of approximately 81.9 dBA L_{eq} at five feet.[10] The roof edge on all elevations would create a natural noise barrier that reduces noise levels from rooftop HVAC units by 10 dBA or more and reduce any noise exposure for nearby receptors. This is helpful in managing noise, as equipment often operates continuously throughout the day, evening, and night.

As shown in **Table 4-5**, noise levels at nearby receptors from HVAC equipment placed away from the edges of the roof of the Project

8 LAMC Section 111.02(b) provides a 5 dBA allowance for noise sources lasting more than 5 but less than 15 minutes in any 1-hour period, and a 10 dBA allowance for noise sources causing noise lasting 5 minutes or less in any 1-hour period. In accordance with these regulations, a noise level increase from certain city-regulated noise sources of 5 dBA over the existing or presumed ambient noise level at an adjacent property is considered a violation.

9 As a 3 dBA increase represents a slightly noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. In instances where the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a readily noticeable 5 dBA increase is still considered to be significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

10 City of Moreno Valley, Moreno Valley WalMart Noise Impact Analysis, Table 901; February 10, 2015 and City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014.

Site would be nominal. Noise levels from HVAC equipment would have to match ambient noise levels to potentially increase 3 dBA or more, the threshold at which humans can notice changes. Reservoir Street and would not even increase noise levels by 3 dBA at sensitive receptors. Regulatory compliance with LAMC Section 112.02 would further ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, the ambient noise levels along Sunset Boulevard Avenue, the relatively quiet operation of modern rooftop-mounted HVAC systems, and distances to receptors, it is unlikely that noise from the Project's HVAC systems would be audible at off-site locations. Nearly all of the Project's surrounding commercial and residential land uses contain similar rooftop-mounted HVAC units. The Project's HVAC systems would be consistent with its surroundings and would not alter the environmental profile of the neighborhood or significantly impact any of the analyzed sensitive receptors.

Table 4-5
Estimated HVAC Operational Noise Levels

Receptor Location	Predicted Noise Level (dBA, L_{eq})	Significant ?
1. Edendale Branch Public Library	43.8	No
2. 2021 Reservoir Street residences	43.6	No
3. Hollywood Sunset Apartments	42.9	No
4. Logan Street Elementary School	26.7	No
Source: DKA Planning, 2019. Assumes reference noise level of 71.9 dBA at one meter of distance.		

In addition, electrical transformers would be located along the northwest corner of the Project Site that would have to comply with LAMC Section 112.02 as well.

		Vaults that house pool and spa equipment and pumps, as well as utility fan rooms, and other operational equipment would be located in the parking garage on the ground floor and lower parking garage levels. As such, this equipment would be fully enclosed within the structure and produce de minimis noise impacts for off-site sensitive receptors that are generally ten feet and beyond the Project Site. Parking and Auto-Related Activities. The Project would generate on-site noise from auto activities associated with the 220 parking spaces in both ground-level and subterranean parking garage. This noise would include driving to and from the entrances to underground garages, parking, door slamming, and occasional car alarms. Vehicles accessing the Project Site would enter off a mid-block driveway off Sunset Boulevard, the garage entrance for which faces south toward Park Avenue. The Project is forecast to generate a maximum of 50 AM and 55 PM net peak hour vehicle trips that would enter and exit this garage. Based on FTA equations for the projection of parking garage noise levels, a parking facility with an average of 42 vehicles during an average hour during the day and 21 vehicles during the evening hour would be predicted to generate an hourly L_{eq} noise level of 44.1 dBA L_{eq} during the day and 4.1.1 dBA L_{eq} during the evenings at the Hollywood Sunset Apartments that approximately face the project's garage entrance.[11] These impacts would not approach existing noise levels along a major arterial like Sunset Boulevard. Any noise from within the garage (e.g., parking garage floor squeaks, car doors closing, alarms, incidental human conversation) would be de minimis, as the enclosed garage would attenuate virtually all sound beyond the Project site. As such, the Project's parking garage would have no noticeable effect on the surrounding noise environment. Residential and Commercial Operational Sources. Noise associated with residential and commercial uses would include a variety of operational sources, including human conversation and

11 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018

		activities, recreation facilities, trash collection, landscape maintenance, and commercial loading operations. These are discussed below: • Human conversation and activities. Noise associated with everyday human activities would largely be contained internally within the Project. Normal and reasonable use of the Project's open space areas would not be expected to generate a substantial amount of noise. Noise associated with outdoor residential activities could include passive activities such as human conversation and socializing on the roof terrace at the sixth floor facing Reservoir Street, a sky deck on the sixth level and interior balconies on the second level that face Sunset Boulevard. These outdoor spaces represent gathering places for outdoor activities that are both private and group oriented. These would be intermittent activities that would produce negligible impacts from human speech, based in large part on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.[12] Given the distance of receptors north of Reservoir Street, human conversation would not result in an exceedance of LAMC noise restrictions. Along Sunset Boulevard, ambient noise levels combined with the 100-foot distance to residences across the street at the Hollywood Sunset Apartments would result in negligible increases in ambient noise levels. Human conversations from commercial activities inside the restaurant and any retail space would be contained entirely within the building located along Sunset Avenue.

[12] Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

		• Recreation facilities. The Project would include an internal courtyard on the second level that would include residential amenities including recreational landscaping and a pool and spa facilities. However, these facilities would be fully enclosed within the closed design of the Project on three sides and have a direct line-of-sight toward Sunset Boulevard only. As such, ambient noise levels combined with the 100-foot distance to residences across the street at the Hollywood Sunset Apartments would result in negligible increases in ambient noise levels. • Landscape maintenance. Noise from gas-powered leaf flowers, lawnmowers, and other landscape equipment can generated substantial bursts of noise during regular maintenance. For example, gas powered leaf blowers and other equipment with two-stroke engines can generated 100 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.[13] However, given the limited landscape plan for the Project, such equipment is not expected to be used substantially in exterior spaces. Any landscape equipment used within the proposed interior courtyard would be attenuated on three sides by the Project. As such, any intermittent landscape equipment would operate during the day and represent a negligible impact for the Hollywood Sunset Apartments 100 feet to the south and ultimately be subject to compliance with LAMC Section 112.05 and nuisance regulations. • Trash collection. On-site trash and recyclable materials would be managed and picked-up within the underground parking garage, where trash and recycling trucks would access these facilities from Sunset Boulevard. Solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. While noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50

[13] Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017

		feet of distance, all noise would be buffered from off-site sensitive receptors.[14] • Commercial loading. On-site loadjng and unloading activities for the restaurant and/or retail uses along Sunset Boulevard be managed and picked-up in the parking garage. where trucks would access these facilities from Sunset Boulevard. With no direct line-of-sight to off-site receptors, there would be negligible noise impacts on off-site receptors. Section 114.03 prohibits loading and unloading causing any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10 P.M. and 7 A.M. The impact of on-site operational noise sources would be considered less than significant. *Consistency with Municipal Code: Off-Site Operations* The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its vehicle travel to and from the Project Site. On a typical weekday, the Project would generate an estimated 670 net vehicle trips on a peak weekday, with about 50 A.M. peak hour trips and 55 P.M. peak hour trips at the start of operations in 2022.[15] During a peak hour, up to 55 net vehicle trips would be distributed onto Sunset Boulevard and/or Park Avenue that accesses the larger roadway network in the Sunset Boulevard corridor. Because the Project would add up to 55 peak-hour vehicle trips across this local network of streets, the Project's incremental traffic on Sunset Boulevard or nearby arterials like would not double existing traffic volumes. For example, there are 2,058 vehicle trips east- and westbound at the intersection of Sunset Boulevard and Park Avenue in the AM peak hour.[16] Even if the Project's contribution of up to 55 peak hour trips would were all distributed onto this

[14] RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003

[15] Crain & Associates, Transportation Impact Study for the Proposed 1911 Sunset Boulevard Mixed-Use Project.

[16] Ibid.

		intersection, it would represent an increase of 2.6 percent in east-west traffic volumes. The Project's traffic impact on other streets would be less, as project-related traffic would dissipate onto the network of streets in the area. As such, peak-hour, project-related traffic would generate far less than a doubling of traffic on Sunset Boulevard and other key roadway segments near the Project Site and result in an inaudible increase in traffic-related noise on local streets. Twenty-four-hour CNEL impacts would similarly be negligible, far below the minimum 3 dBA noise increase threshold. Therefore, the Project's operational impact on off-site ambient noise levels as a result of its net traffic generation would be considered less than significant. Therefore, the Project's operational impact on off-site ambient noise levels as a result of its net traffic generation would be consistent with the Municipal Code. In addition to compliance with such ordinances and in furtherance of the City's policies to reduce construction and operational noise levels, the Project will be conditioned to comply with the following best management practices: • Construction haul truck and materials delivery traffic will avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences. • Comply with the State's anti-idling regulation, codified in Title 13 California Code of Regulations (CCR) Section 2485, which applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This regulation does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time, with certain exception for vehicles where idling is a necessary performance activity such as for concrete trucks. • The construction contractor will locate construction staging areas away from noise-sensitive uses.

		• The construction contractor will locate fixed/stationary construction equipment, such as generators, compressors, and cement mixers as far as possible from noise-sensitive uses. • Impact pile drivers will not be used. If piles are required, the use of quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, will be utilized where geological conditions permit their use. Noise shrouds will be used when necessary to reduce noise of pile drilling/driving. • Impact tools will be hydraulically or electrically powered, to the extent such tools are commercially available in the City of Los Angeles, to avoid noise associated with compressed air exhaust from pneumatically powered tools. • Construction equipment will be equipped with mufflers and/or best available noise suppression devices that comply with manufacturers' requirements. • Notify neighbors and occupants within 300 feet of the Project construction area at least 30 days in advance of groundbreaking for construction. • Designate an on-site construction complaint and enforcement manager for the Project. Post a sign at the construction site that includes permitted construction days and hours, and contact phone number for the job site to report noise complaints. Given the Project's compliance with the required standards, best management practices, and with incorporation of the Project Commitment listed above, the Project will be in substantial compliance with **SCAG MM-NOISE-1(b).**
NOISE-2: Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	**MM-NOISE-1(b).** **MM-NOISE-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead	The Project will comply with Section 91.3307 of the LAMC (Protection of Adjoining Property). Specifically, Section 91.3307.1 (Protection Required) states adjoining public and private property shall be protected from damage during construction, remodeling and demolition work. Protection must be provided for footings, foundations, party (i.e., shared) walls, chimneys, skylights, and roofs.

	Agency can and should consider mitigation measures to ensure compliance with the Federal Transportation Authority and Caltrans guidance documents, county or city transportation commission, noise and vibration ordinances and general plan noise elements for the counties and cities where projects are undertaken and other health and safety regulations set forth by federal state, and local authorities that regulate vibration levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. • For projects where pile driving will be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. • For projects where pile driving will be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration.	For excavations, adjacent property shall be protected as set forth in Section 832 of the Civil Code of California. Prior to the issuance of any permit, which authorizes an excavation where the excavation is to be of a greater depth than are the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the site shall provide the Department of Building and Safety with evidence that the adjacent property owner or owners have been given a 30-day written notice of the intent to excavate. This notice shall state the depth to which the excavation is intended to be made and when the excavation will commence. This notice shall be by certified mail, return receipt requested. The Project would not use impact pile drivers. If piles are required, the use of quiet pile driving techniques will be used, which would minimize noise and vibration. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks will be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, the Project will be in substantial compliance with **SCAG MM-NOISE-2(b).**

NOISE-3: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	**MM-NOISE-1(b).**	The Project would generate approximately 670 net new vehicle trips per day (refer to Table 5 of the Transportation Impact Study). Therefore, even conservatively assuming that all Project trips would occur at these intersections nearest to the Project Site, it is clear that the Project would not double the traffic volumes on any roadway segment in the vicinity of the Project Site and, as such, the Project would not increase roadway noise levels by 3 dBA. A 3 dBA change in noise level is considered to be a barely perceivable difference, and requires a doubling (or halving) of sound energy (i.e., in the case of traffic noise, a 3 dBA increase in noise level generally requires a doubling of the traffic volume). Thus, traffic from the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. New stationary sources of noise associated with the Project, such as mechanical HVAC equipment will be installed for the proposed building. The design of this equipment will comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. Thus, because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by 5 dBA on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Furthermore, the mechanical HVAC equipment would incorporate standard design techniques that would minimize noise such as manufacturer provided sound enclosures and parapets, screens, or other similar barriers to shield from view. Therefore, stationary noise source levels associated with the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
NOISE-4: Result in a substantial temporary or periodic increase in	**MM-NOISE-1(b).**	The Project substantially conforms to this mitigation measure, as described under **NOISE-1** through **NOISE-3**.

ambient noise levels in the project vicinity above levels existing without the project.		
NOISE-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in the exposure of people residing or working in the project area to excessive noise levels.	No mitigation.	No mitigation applies.
NOISE-6: For a project within the vicinity of a private airstrip, result in the exposure of people residing or working in the project area to excessive noise levels.	No mitigation.	No mitigation applies.
Population, Housing, and Employment		
PHE-1: Potential to induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	**MM-LU-1(b).**	The Project substantially conforms to this mitigation measure. As discussed earlier, the Project is consistent with the 2016 RTP/SCS. The Project will provide up to 166 residential units and approximately 13,000 square feet of neighborhood commercial uses, which would generate new employment on the Project Site. Based on an average household size of 2.42 per unit[17] the Project's 166 dwelling units would generate a direct population increase of approximately 402 people. Based on employment generation factors of 369 square feet per employee for commercial uses (LAUSD Developer Justification Study for LAUSD March 2020), the Project would generate 35 new

[17] The source for the 2.42 persons-per-household rate for the City is Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

		employees. The addition of 402 residents represents 0.009 percent of the estimated population of 4,609,414 persons in the City of Los Angeles in 2040 (SCAG 2016-2040 RTP). The increase in employment would represent 0.002 percent increase of the projected 2,169,114 jobs in 2040 (SCAG 2016-2040 RTP). This increase would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population or employment. Because the Project is located within a designated City of Los Angeles Transit Priority and within an area meeting SCAG's definition of a high quality transit area, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies. As such, population and employment growth associated with the Project will be less than significant and no mitigation measures are required.
PHE-2: Potential to displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere.	**MM-PHE-2(b).** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction's housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on	The Project Site is currently developed with commercial uses (medical office and restaurant), and does not contain any existing housing. Therefore, development of the Project would not displace any existing housing and would not require construction of replacement housing. No impact would occur and no mitigation measures are required. The Project will add 166 units of needed new housing, including 21.8% of base density (24 units) will be reserved for Very Low Income Households.

	housing and displacement of people. • Prioritize the use existing ROWs, wherever feasible. • Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.	
PHE-3: Potential to displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	**MM-PHE-2(b).**	The Project Site is currently developed with commercial uses (medical office and restaurant), and does not contain any existing residential uses. Therefore, development of the Project would not displace any existing residents and would not require construction of replacement housing. No impact would occur and no mitigation measures are required. The Project will add 166 units of needed new housing, including 21.8% of base density (24 units) will be reserved for Very Low Income Households..
Public Services		
PS-1: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency response services.	**MM-AES-1(b), MM-AES3(b), MM-AES-4(b), MM-AF-1(b), MM-AF2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b),** and **MM-USS-6(b).** **MM-PS-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide	The Project substantially conforms to this mitigation measure. The Project would also be subject to compliance with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the City of Los Angeles Municipal Code and the Los Angeles Fire Department (LAFD), to ensure adequate fire protection. Key components of these regulatory requirements that will be implemented as part of the Project pursuant to LAFD review and guidance include the following: • Building Design: Fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet code requirements. • Fire Safety Features: Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system. • Emergency Safety Provisions: Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an

	sufficient structures and buildings to accommodate fire and emergency response, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible: Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements. During project-level review of government facilities projects, require implementation of Mitigation Measures **MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MMBIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS3(b), MM-USS-4(b),** and **MM-USS-6(b)** to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	emergency incident (e.g. floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an onsite emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services. • LAFD Access: Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access. In addition, the City of Los Angeles requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading will be prepared for review and approval by the LAFD. The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and LAFD's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Fire-flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system, with the required gallons per minute flowing. Based on a required fire-flow of 6,000 to 9,000 gpm the first-due Engine Company should be within 1 mile, the first-due Truck Company within 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.

		According to LAMC Section 57.512.1,[18] response distances based on land use and fire-flow requirements shall comply with Table 57.507.3.3.[19] For an industrial and commercial land use, the maximum response distance is 1 mile for an engine company and 1.5 miles for a truck company. The maximum response distances for both fire suppression companies (engine and truck) must be satisfied. According to LAMC Section 57.512.2[20], where a response distance is greater than that shown in Table 57.507.3.3 (table recreated above), all structures shall be constructed with automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Fire Chief. As shown in **Table 4-6**, the Project Site is located 0.2 from Fire Station No. 20 (2144 Sunset Boulevard) which has a light force (composed of a truck company and engine company).[21] Therefore, the Project Site is located within the distance identified by LAMC Section 57.512.1[22] (i.e. within 1.5 mile for an engine and 2 miles for a truck). At present, there are no immediate plans to increase LAFD staffing or resources in those areas, which would serve the Project. Therefore, the Project would not require the construction of a new or expanded fire station.

18 LAMC Section 57,512.1, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_57.512.

19 LAMC Table 57,507.3.3, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_TABLE57.507.3.3

20 LAMC Section 57,512.2, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_57.512.2.

21 LAFD: http://www.lafd.org/about/about-lafd/apparatus.

22 LAMC Section 57,512.1, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_57.512.

Table 4-6
Fire Stations

Equipment	Response Time (minutes)	Incident Counts
Light Force Assessment Engine Paramedic Ambulance	EMS: 6:33 Non-EMS: 5:55	EMS: 3,072 Non-EMS: 792
Data: Jan to Dec 2020 http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf Light Force: Truck company and single engine. Task Force: Truck company and two fire engines. LAFD September 2019 Fire Station Directory. Table: CAJA Environmental Services, June 2021.		

The Project would be constructed with automatic fire sprinkler systems and any additional fire protection as required by the LAFD Chief or the LAMC. Final fireflow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project by LAFD during the plan check process. If the Project is determined to require one or more new hydrants during plan check in accordance with city standards, the Project would have to provide them.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to

		spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[23] The Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that it would require construction of new fire facilities resulting in potential environmental impacts. Even if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Project area is highly developed, and the site of a fire station or expansion of a fire station would likely be on an infill lot that would likely be less than an acre in size. The Project and related projects also would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time, as appropriate.
PS-2: Potential to cause substantial adverse	**MM-AES-1(b), MM-AES3(b), MM-AES-4(b), MM-AF-1(b), MM-AF2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO3(b),**	The Project substantially conforms to this mitigation measure.

23 City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public protective security services.	**MM-CUL-1(b), MM-CUL-2(b), MMCUL3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b),** and **MM-USS-6(b).** **MM-PS-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including: Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description. Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.	The Project Site is served by the City of Los Angeles Police Department's (LAPD) Central Bureau, Northeast Community Police Station, located at 3353 San Fernando Road. The Station is approximately 3.5 miles driving distance from the Project Site.[24] The Station area is 29 square miles in size, has approximately 250,000 residents, and has approximate 285 sworn officers.[25] At present, there are no immediate plans to increase LAPD staffing or resources in those areas, which would serve the Project. The current ratio of residents to officer is 877 residents per officer. The Project would add approximately 402 residents.[26] Thus, the Project would represent approximately 0.47% of 1 officer. Therefore, the Project would not require the construction of a new or expanded police station. The existing police to population ratio of 1 officer per 877 residents. The Project's 402 residents would demand less than 0.47% officers to maintain the same service ratio. This increase is negligible and represents less than 1% increase compared to the number of existing officers. During construction, all sides around the Project Site would need to be secured to prevent trespass and theft of building materials. The Project Applicant would employ construction security features, such as fencing, which would serve to minimize the need for LAPD services. Temporary construction fencing would be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. The potential for crime can be reduced with site-specific designs and features. The Project would include standard security measures such as adequate security lighting, secure access to non-public areas and separate residential access points. Parking would be in a parking structure integrated into the building. The LAPD will

24 http://www.lapdonline.org/northeast_community_police_station

25 http://www.lapdonline.org/northeast_community_police_station

26 The source for the 2.42 persons-per-household rate for the City is Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

	During project-level review of government facilities projects, require implementation of Mitigation Measures **MM-AES-1(b), MM-AES-3(b), MM-AES4(b), MM-AF-1(b), MM-AF-2(b), MMBIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS3(b), MM-USS-4(b),** and **MM-USS-6(b)** to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	require that the commanding officer of the Station be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response. Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by voters in 1993 pursuant to Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with Proposition 172 to ensure that public safety services are provided.[27] The Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios that would result in potential environmental impacts. The Project Site and surrounding areas, including the related projects, growth in residential population and development throughout the City could increase demand for LAPD staffing, equipment, and facilities Citywide. These demands are met by LAPD through the allocation of available resources by LAPD

27 City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

		management to meet varying needs throughout the LAPD's Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Any requirement for a new police station, or the expansion, consolidation, or relocation of an existing police station would be identified through this process, the impacts of which would be addressed accordingly. Furthermore, the Project, as well as the related projects, would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate by the City.
PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools services.	**MM-AES-1(b), MM-AES3(b), MM-AES-4(b), MM-AF-1(b), MM-AF2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b),** and **MM-USS-6(b).** **MM-PS-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as	Payment of appropriate school fees to LAUSD is required by law and considered full mitigation, impacts will be less than significant and no mitigation measures are required.

	applicable and feasible: Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. During project-level review of government facilities projects, require implementation of Mitigation Measures **MM-AES-1(b), MM-AES-3(b), MM-AES4(b), MM-AF-1(b), MM-AF-2(b), MMBIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS3(b), MM-USS-4(b),** and **MM-USS-6(b)** to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
Recreation		
REC-1: Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	**MM-REC-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures capable of avoiding or reducing significant impacts on the use of existing neighborhood and regional parks or other recreational facilities to ensure compliance with county and city general plans and the Quimby Act, as applicable and feasible. Such measures may include the following, or other comparable measures	The Project substantially conforms to this mitigation measure. The Project would provide 13,303 square feet of open space and recreational amenities to serve its residents. In addition, the Project applicant will be required to comply with Quimby parkland dedication or fee requirements, Ordinance 184,505 and applicable LAMC requirements, as necessary.

	identified by the Lead Agency: • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: – Increasing the accessibility to natural areas for outdoor recreation. – Promoting infill development and redevelopment to revitalize existing communities. – Utilizing "green" development techniques. – Promoting water-efficient land use and development. – Encouraging multiple uses. – Including trail systems and trail segments in General Plan – recreation standards. • Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the	

	HQTA. • Where construction or expansion of recreational facilities is included in the project or required to meet public park service ratios, require implementation of Mitigation Measures **MM-AES-1(b), MMAES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO2(b), MM-BIO-3(b), MM-CUL-1(b), MMCUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MMHYD-1(b), MM-USS-3(b), MM-USS4(b),** and **MM-USS-6(b)** to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
REC-2: Potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	See **MM-REC-1(b).**	The Project would provide 13,303 square feet of open space and recreational amenities. The Project would also include 42 on site trees. The Project's open space and recreational amenities include indoor amenities, a pool and spa, courtyard and roof top decks to serve the needs of project residents. The Project does not include, nor would it necessitate, a park or public recreational facility component, the construction of which could have an adverse environmental impact. Therefore, no impact would occur and no mitigation measures are required.
Transportation, Traffic, and Safety		
TRA-1: Potential to conflict with the established measures of effectiveness for the performance of the circulation system, by increasing the daily VMT, taking into account all	**MM-TRA-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and	The Project substantially conforms to this mitigation measure. As shown in **Appendix H-1: Transportation Impact Analysis**), based on the VMT analysis, the Project is anticipated to have a significant impact based on its residential component (daily household VMT per capita). Thus, additional TDM strategies beyond those included as Project features were explored to reduce the Project's daily household VMT per capita (8.8) below the East

modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency: • Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation • Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides. • Provide a vanpool for employees. • Fund capital improvement projects to accommodate future traffic demand in the area. • Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: – Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement. – Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document). – Signage and striping onsite to encourage bike safety. – Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage	Los Angeles APC significance threshold for daily household VMT per capita (7.2). The Project proposes to: (1) reduce the Project parking supply from the City Municipal Code requirement of 300 parking spaces (per Municipal Code Section 12.21.A4) to 220 parking spaces, and (2) integrate unbundled parking as part of the development, thereby separating the cost of renting a residential dwelling unit from the cost to rent a parking space. See mitigation measure **MM-Trans-1**. Applying the reduced parking supply strategy and unbundled parking strategy (with an assumed monthly parking space cost of $150), the VMT Calculator determined that the Project would generate the following with-mitigation trip estimates: 894 daily vehicle trips and 5,130 daily VMT. Based on the 5,130 daily VMT, the VMT Calculator determined that the Project would generate 6.3 daily household VMT per capita. This value falls below the East Los Angeles APC area threshold of significance of 7.2 daily household VMT per capita. Therefore, the provision of a reduced parking supply and unbundled parking would reduce the Project's daily household VMT per capita to a less-than-significant level. **MM-Trans-1 Transportation Demand Management (TDM) Strategies:** (1) reduce the Project parking supply from the City Municipal Code requirement of 300 parking spaces (per Municipal Code Section 12.21.A4) to 220 parking spaces, and (2) integrate unbundled parking as part of the development, thereby separating the cost of renting

	convenient crossing at arterials. – Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan. – Direct transit sales or subsidized transit passes. – Guaranteed ride home program. – Pre-tax commuter benefits (checks). – On-site car-sharing program (such as City Car Share, Zip Car, etc.) – On-site carpooling program. – Distribution of information concerning alternative transportation options. – Parking spaces sold/leased separately. – Parking management strategies; including attendant/valet parking and shared parking spaces. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas. • Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible. • Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. • Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large	a residential dwelling unit from the cost to rent a parking space. As noted in **Appendix H-2: LADOT Letter, t**o off-set the expected significant impacts identified in the project's transportation assessment study, LADOT recommends that the applicant be required to implement the TDM strategies of reducing the parking supply and unbundling parking as mitigation measures. Reducing the parking supply encourages alternative transportation choices by project residents and employees. Unbundling parking costs from property costs would require those who wish to purchase parking spaces to do so at an additional cost from the property cost. This removes the burden from those who do not wish to utilize a parking space. An assumption is made that the parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces. The Project Applicant will be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. The Project would include a Construction Management Plan that would include measures to ensure pedestrian safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use of flag persons, rerouting, and installation of protection barriers). The features of the Construction Management Plan shall include, but not be limited to, the following elements, as appropriate: • Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation. • Prohibition of construction worker or equipment parking on adjacent streets. • Temporary pedestrian, bicycle, and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to ensure traffic safety on public roadways. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety.).

	developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work. • Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs. • Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles. • Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions. • Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. • Purchase, or create incentives for purchasing, low or zero-emission vehicles. • Create local "light vehicle" networks, such as neighborhood electric vehicle systems. • Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles. • Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles. • Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives.	• Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons). • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets. • Potential sequencing of construction activity to reduce the amount of construction-related traffic on arterial streets. • Containment of construction activity within the Project Site boundaries. • Prohibition of construction-related vehicles/equipment parking on surrounding public streets. • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate. • Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible. Thus, with the Project' s Commitment of a Construction Management Plan, construction and operation of the Project would not result in a significant impact to the performance of the circulation system. Therefore, impacts will be less than significant and no mitigation measures are required. The Project is consistent with 2016 RTP/SCS policies to reduce VMT, congestion and greenhouse gases. The Project is a mixed-use, infill project in a TPA located close to numerous bus transit lines. The Site is within a High Quality Transit Area (HQTA), which reflect areas with rail transit service or bus service where lines have peak headways of less than 15 minutes. The intersection of Sunset and Alvarado, located 450 feet west of the Site, provides access to the following lines: Metro 2, 4, 200, 302, 603, Rapid 704. The Project Site is located on Sunset Boulevard, which is a major commercial and retail corridor, with many amenities and services located within a short walking distance, which will reduce vehicle

	• Project Selection: – Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. – Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. • Public Involvement: – Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services. • Transit and Multimodal Impact Fees: – Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. – Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. • System Monitoring: – Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency.	trips and vehicle miles traveled. A major supermarket (Von's) is located less than one block away from the Project Site, and two pharmacies (Rite-Aid and CVS) are located approximately two blocks away. The Project Site is located one block from Echo Park Recreation Center, which will maximize the accessibility of recreation and park resources to the Project's residents. Logan Street Elementary School and Gabriella Charter School are located approximately two blocks from the Project Site. The Edendale Branch of the Los Angeles Public Library is adjacent to the Project Site on Sunset. The Echo Park Senior Center is located approximately two blocks away.

	• Arterial Traffic Management: – Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. • Signal Synchronization: – Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic. • HOV Lanes: – Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. • Delivery Schedules: – Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas. – Implement and supporting trip reduction programs. – Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives. • Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist	

	accommodations, and require new development and redevelopment projects to include bicycle facilities. • Bicycle and Pedestrian Trails: – Establish a network of multi-use trails to facilitate safe and direct offstreet bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations. • Bicycle Safety Program: – Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers. • Bicycle and Pedestrian Project Funding: • Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects. • Bicycle Parking: – Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists). • Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: – Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative	

	modes of transportation; – Eliminate or reduce minimum parking requirements for new buildings; – "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space); – Use parking pricing to discourage private vehicle use, especially at peak times; – Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; – Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times; – Encourage shared parking programs in mixed-use and transit-oriented development areas. • Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: – Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking; – Encourage special event center operators to advertise and offer discounted transit passes with event tickets; – Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for onsite parking; – Promote the use of bicycles by providing space for the operation of valet bicycle parking service.	

	• Parking "Cash-out" Program: – Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use. • Pedestrian and Bicycle Promotion: – Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. • Fleet Replacement: – Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.	
TRA-2: Potential to conflict with an applicable congestion management program, including, but not limited to, VMT and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways.	**MM-TRA-2(b).** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by	The Project substantially conforms to this mitigation measure. A Construction Management Plan will be implemented as a condition of the Project as described above. This mitigation measure is not incorporated, because it is not applicable to the Project. The Traffic Impact Analysis (TIA) guidelines of the 2010 CMP for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed. The Project would not add a total of 50 or more peak-hour trips to any CMP arterial monitoring locations or 150 peak-hour trips to any CMP freeway monitoring locations. Thus, the Project would not result in any significant impacts related to CMP facilities, and no mitigation measures are required.

	the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions: • Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: – Advocate for a regional, market-based system to price or charge for auto trips during peak hours. – Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. – Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. – Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation. – Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay.	

	• Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency: – A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes. – Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. – Location of construction staging areas for materials, equipment, and vehicles at an approved location. – A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit. – Provision for accommodation of pedestrian flow. – As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces.	

	– Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense, within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy. – Any heavy equipment brought to the construction site shall be transported by truck, where feasible. – No materials or equipment shall be stored on the traveled roadway at any time. – Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion. – All equipment shall be equipped with mufflers. – Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors. – Promote “least polluting” ways to connect people and goods to their destinations. • Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by	

	incorporating the following, if determined feasible and applicable by the Lead Agency: – Ensure transportation centers are multi-modal to allow transportation modes to intersect. – Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail. – To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges. – Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations. – Coordinate schedules and routes across service lines with neighboring transit authorities. – Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles). – Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so. – Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles. – Provide safe and convenient access for pedestrians and bicyclists to, across, and along	

	major transit priority streets. – Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible. • Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: – Ensure transit stops and bus lanes are safe, convenient, clean and efficient. – Ensure transit stops have clearly marked street-level designation, and are accessible. – Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate. – Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one half mile. • Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including: – Develop a Regional Pass system to reduce the number of different passes and tickets required of system users. – Implement "Smart Bus" technology, using GPS and electronic displays at transit stops to provide customers with "real-time" arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service). – Investigate the feasibility of an online trip-planning program.	

	• Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including: – Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic. – Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access. • Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: – Designate a certain percentage of parking spaces for ride-sharing vehicles. – Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles. – Provide a web site or message board for coordinating shared rides. – Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit. – Hire or designate a rideshare coordinator to develop and implement ridesharing programs. • Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including:	

	– Provide assistance to regional and local ridesharing organizations. – Advocate for legislation to maintain and expand incentives for employer ridesharing programs. – Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes. – Provide public recognition of effective programs through awards, top ten lists, and other mechanisms. • Implement a "guaranteed ride home" program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program. • Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations. • Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers. • Work with existing shuttle service providers to coordinate their services. • Facilitate employment opportunities that minimize the need for private vehicle trips, including: – Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations. – Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate. • Enforce state idling laws for commercial vehicles,	

	including delivery and construction vehicles. • Organize events and workshops to promote GHG-reducing activities. • Implement a Parking Management Program to discourage private vehicle use, including: – Encouraging carpools and vanpools with preferential parking and a reduced parking fee. – Institute a parking cash-out program. – Renegotiate employee contracts, where possible, to eliminate parking subsidies. – Install on-street parking meters with fee structures designed to discourage private vehicle use. • – Establish a parking fee for all single-occupant vehicles. • Work with school districts to improve pedestrian and bicycle to schools and restore school bus service. • Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities. • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. • Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers. • Synchronize traffic signals to reduce congestion and air quality. • Work with community groups and business associations to organize and publicize walking tours and bicycle events.	

	• Support legislative efforts to increase funding for local street repair.	
TRA-3: Potential to result in a significant change in air traffic patterns, including either an increase in air traffic levels or a change in location that results in substantial safety risks.	No mitigation.	No mitigation applies.
TRA-4: Potential to substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections), increased volumes or incompatible uses (e.g., farm equipment).	No mitigation.	No mitigation applies.
TRA-5: Potential to result in inadequate emergency access.	**MM-TRA-5(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:	The Project substantially conforms to this mitigation measure. Emergency access to the Project site will be provided by the existing street system, and the Project will be designed and constructed in accordance with LAMC requirements to ensure proper emergency access. Moreover, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lane of opposing traffic. The Project would include a Construction Management Plan as a Project Commitment, which would include protocols to minimize impacts on surrounding roadways during construction. The Project will be subject to the site plan review requirements of LAFD and LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Therefore, no mitigation measures are required.

	• 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) will 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. – 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 will 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. • Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: – Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities. – Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. – Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.	
TRA-6: Potential to result in conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or	No mitigation.	No mitigation applies.

<table>
<tr><td>otherwise decrease the performance or safety of such facilities.</td><td></td><td></td></tr>
<tr><td colspan="3">Utilities and Service Systems</td></tr>
<tr><td>USS-1: Potential to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.</td><td>No mitigation.</td><td>No mitigation required.</td></tr>
<tr><td>USS-2: Potential to require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</td><td>No mitigation.</td><td>No mitigation required. The City requires that, as part of the normal construction/building permit process, the Applicant or its successor confirms with the City that the capacity of the local and trunk lines are sufficient to accommodate a project’s sewer flows during the construction and operation phases. Furthermore, a project shall implement any upgrades to the sewer system serving the project that could be needed to accommodate the project’s wastewater generation.

As shown on Table 4-7, the Project would generate an increase of approximately 22,481 gallons of wastewater per day (or 0.023 mgd). This total does not take any credit for any proposed sustainable and water conservation features of the Project. This is a worst-case, conservative approach. With a remaining daily capacity of 175 mgd, the HTP would have adequate capacity to serve the Project’s projected 0.023 mgd generation. Therefore, no Project impacts related to wastewater treatment would occur and the Project would be adequately served by the City’s wastewater facilities.

Table 4-7
Estimated Wastewater Generation
<table><tr><th>Land Use</th><th>Size</th><th>Rates</th><th>Total (gpd)</th></tr><tr><td>Residential</td><td>166 units</td><td>150 gallons / unit</td><td>24,900</td></tr><tr><td>Restaurant</td><td>13,000 sf</td><td>300 gallons / 1,000 sf</td><td>3,900</td></tr><tr><td>Restaurant (removed)</td><td>18,000 sf</td><td>300 gallons / 1,000 sf</td><td>(5,400)</td></tr></table></td></tr>
</table>

Medical office (removed)	4,085 sf	225 gallons / 1,000 sf	(919)
		Total	**22,481**

Note: sf = square feet; gpd = gallons per day

Rates: Sewage Generation Factor, effective date April 6, 2012: City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.

Table: CAJA Environmental Services, September 2019.

The Project, in combination with existing and future projects within the area served by the HTP, would result in cumulative increases in wastewater generation. However, increased wastewater flows to the HTP are addressed in the IRP, which includes a plan to ensure that existing wastewater processing facilities are sufficient to handle projected flows through 2020 of the expected 18.7 percent population growth for the City. The environmental impacts of potentially expanding the existing facilities have already been analyzed in the Draft and Final EIRs prepared and certified for the IRP. In June 2012, LABS and the LADWP issued the *Water Integrated Resources Plan Five Year Review*, which identified that actual average wastewater flows to the HTP in 2010 were approximately 26.5 percent below projections based upon 2008 demographic data from SCAG. Accordingly, the requirement for physical expansions of the HTP to address increased flows that are included in the IRP have not been triggered and it would appear likely that the requirements set forth in the IRP will remain valid beyond the 2020 horizon year of the IRP. Furthermore, the design capacity of the HTP is 450 million gpd and the HTP's current average wastewater flow is 275 million gpd. Therefore, the HTP has a remaining capacity of approximately 175 million gpd. The sewage generation of the Project is expected to be approximately 0.023 million gpd. Therefore, cumulative impacts to wastewater treatment capacity would be less than significant.

USS-3: Require or result in construction of new storm water drainage facilities or expansion of existing facilities, the	See **MM-HYD-5(b).** **MM-USS-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the	The Project substantially conforms to this mitigation measure. Due to the largely impervious existing Project Site conditions and the increase in the amount of landscaping and other pervious surfaces, the Project would not result in a significant increase in site runoff,

construction of which could cause significant environmental effects.	significant effects on utilities and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8, and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan. Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant impacts on the use of existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities.	or any changes in the local drainage patterns. Runoff from the Project Site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity on Sunset. Therefore, the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems.
USS-4: Have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements.	**MM-USS-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter – Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and applicable County, City or other Local provisions. Such measures may include the following or other comparable measures identified by the Lead Agency:	Implementation of the Project, in combination with existing and future projects within the service area of LADWP, would generate demand for additional water supplies. The anticipated water demand from the Project falls within the UWMP's projected water supplies for normal, single-dry, and multiple-day years through 2035, and within the UWMP's 25-year water demand growth projection. Consideration of existing sources of supply, coupled with the combined effect of continued actions to assure the reliability of the City's water supply, is expected to result in adequate water supplies for the LADWP service area through at least 2035. As also indicated in the UWMP, local water supplies and new water conservation are projected to increase from the current 12 percent to 43 percent by 2035. This increased local supply mix will allow the LADWP to reduce its Metropolitan Water District water supply purchases by half, increasing flexibility and overall reliability, particularly during periods of water shortage. Accordingly, demand from the Project, in conjunction with other projects within the

	• Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. • Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. • Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. • Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. • Comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.	LADWP service area, is expected to be within the supplies available to LADWP, and cumulative impacts related to water supply would be less than significant. The Project substantially conforms to this mitigation measure to reduce water consumption. To ensure that the Project reduces its projected water demand to the extent feasible, the Project will be required to comply with 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). To determine the Project's specific energy and water use, an Energy & Water Efficiency Compliance Memo has been prepared (**Appendix F: Energy and Water Efficiency Compliance Report**). As discussed earlier, the Project will be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region. The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, high performance building envelop walls, roof, and floor, glazing windows, reduction of lighting power density with the use of high-efficacy LED lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems heat-pumps with SEER (seasonal energy efficiency ratio) =16 or higher, and centralized domestic hot water system with 95% thermal efficiency and a 50% solar thermal system. The efficiency measures result in 17.3 percent less energy than Title 24 requirements. The Project would utilize low flow water fixtures that achieves and exceeds the City of Los Angeles' water conservation goals. This was achieved with features such as energy star appliances for

		dishwasher and clothes washers, low flow faucets and fixtures (see table for targets), water-saving pool features (pool covers), water efficient drip irrigation systems and weather based-controllers-and drought-tolerant native plantings for landscaping. The water savings features results in a 73.9 percent water savings than the regional average household water use. To ensure compliance with the assumptions of the Energy and Water Efficiency Compliance Report, the Project will be required to implement the following a condition of approval: • The Project shall comply with the energy efficiency and water efficiency measures listed in the Energy and Water Efficiency Compliance Report.
USS-5: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's commitments.	No mitigation.	No mitigation applies.
USS-6: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	**MM-USS-6(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such measures may include the	The Project substantially conforms to this mitigation measure. The Project will comply with the City of Los Angeles Green Building Code, which requires the recycling and/or salvaging of 65 percent of non-hazardous construction and demolition waste. Project construction waste will be hauled by permitted haulers and taken only to City-certified construction and demolition (C&D) processing facilities that are monitored for compliance with recycling regulations. Project-generated C&D waste would represent a very small percentage of the waste disposal capacity in the region and as described above, in compliance with City Ordinance 181,519, the C&D waste will be further minimized. Based on the information provided in the 2019 Countywide Integrated Waste Management Plan Annual Report, the remaining

	following or other comparable measures identified by the Lead Agency: • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: – Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. – Inclusion of a waste management plan that promotes maximum C&D diversion. – 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.). – Reuse of existing structure and shell in renovation projects. – Design for deconstruction without compromising safety. – Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building	disposal capacity for the County's Class III landfills is estimated at approximately 148.40 million tons.[28] In 2019, approximately 5.228 million tons of solid waste were disposed of at the County's Class III landfills, 0.207 million tons of inert waste at the County's inert[29] landfill (Azusa), and 0.337 million tons at transformation facilities.[30] Of the remaining Class III landfill capacity in the County, approximately 76.08 million tons are available to the City.[31] As is the case with solid waste haulers, landfills operate in a free-enterprise system. Their operating funds and profits are obtained by collecting disposal fees from the haulers on a per ton basis. Landfill capacity is regulated primarily through the amount of solid waste that each particular facility is permitted to collect on a daily basis relative to its capacity. The 2019 Annual Report indicates that the countywide cumulative need for Class III landfill disposal capacity, approximately 154.3 million tons in 2032, will exceed the 2019 remaining permitted Class III landfill capacity of 148.4 million tons. Wasteshed boundaries, geographic barriers, weather, and natural disasters could place further constraints on accessibility of Class III landfill capacity. Therefore, the Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and

28 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4: https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#, accessed January 27, 2021.

29 A inert debris includes, but is not limited to, concrete (including fiberglass or steel reinforcing bar embedded in the concrete), fully cured asphalt, crushed glass, fiberglass, asphalt or fiberglass roofing shingles, brick, slag, ceramics, plaster, and clay products.

30 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4: https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#, accessed January 27, 2021.

31 Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site. The Chiquita Canyon Landfill Expansion permits the facility to operate until it reaches 60 million tons, or after 30 years, whichever comes first. However, since the current volume of the facility's wasteshed is unknown, the volume of waste that it would take to reach 60 million tons cannot be determined. As such, for a conservative analysis, the Chiquita Canyon Landfill Expansion is excluded from the total.

	components. – Development of indoor recycling program and space. – 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. – Locally generated waste should be disposed of regionally, considering distance to disposal site. – Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required. – Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. – 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. – Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events	processing infrastructure, and use out of county disposal, including waste by rail. The County's unclassified landfill generally does not currently face capacity issues. The remaining disposal capacity for Azusa Land Reclamation is estimated at approximately 58.84 million tons. In 2019, approximately 0.266 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at this unclassified landfill. Given the remaining permitted capacity, this capacity would be exhausted in 26 years.[32] Thus, the unclassified landfill serving the County has adequate long-term capacity. While the City's Bureau of Sanitation (BOS) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. In 2018, the City disposed of approximately 3.3 million tons of solid waste at the County's Class III landfills, approximately 1,968 tons at transformation facilities, and 214 million tons at the inert landfill.[33] The 3.3 million tons of solid waste accounts for approximately 4.3 percent of the total remaining capacity (76.08 million tons) for the County's Class III landfills open to the City.[34] Using generation factors provided by CalRecycle, the Project's residential portion would generate approximate 379 tons per year and the commercial portion would generate approximately 11,654 tons year, for a total of 12,033 tons per year. The increase in solid waste disposal would represent an

32 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4: https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#, accessed January 27, 2021.

33 These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

34 3.3 million tons ÷ 76.08 million tons x 100% = 4.3%.

	and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. – Develop alternative waste management strategies such as composting, recycling, and conversion technologies. – Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. – Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). – Integrate reuse and recycling into residential industrial, institutional and commercial projects. – Provide recycling opportunities for residents, the public, and tenant businesses. – Provide education and publicity about reducing waste and available recycling services. – Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates. – Implement or expand city or county-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.	approximate 0.37 percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.3 million tons. The increase in solid waste disposal would represent approximately 0.015 percent of the estimated remaining Class III landfill capacity of 76.08 million tons available to the City. As such, the solid waste generated by the Project will be an insignificant impact to the landfill capacity and could be accommodated by the County's available regional landfills. In addition, waste generated by the Project will be subject to State and local recycling and waste diversion strategies and policies including the City's Zero Waste Plan goal of achieving a 90 percent solid waste diversion rate by 2025.
USS-7: Potential to comply with federal, state, and local statutes and regulations related to solid	No mitigation.	No mitigation applies.

waste.		
SCAG Final 2016 Program EIR: http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx		

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
AESTHETICS	
Impact AES-1 Potential for the Plan 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 State CEQA Guidelines, 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 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)	**No mitigation applies**. PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2452 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within TPAs pursuant to CEQA. Per the ZIMAS, ZI No. 2452 is applicable to the Project Site. The Project is an infill affordable housing development, consisting of 166 dwelling units within a HQTA and a TPA. As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Thus, incorporation of this mitigation measure is not required.
Impact AES-2 Potential to substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway See PMM AES-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM AES-1, above.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
Impact 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	**No mitigation applies**. PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."
PMM AES-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 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:	Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2452 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within TPAs pursuant to CEQA. Per ZIMAS, ZI No. 2452 is applicable to the Project Site.
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:	The Project is an infill affordable housing development, consisting of 166 dwelling units within an HQTA and a TPA. As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
- 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; - 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	
Impact AES-4 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 State CEQA Guidelines, 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.	**No mitigation applies**. PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2452 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within TPAs pursuant to CEQA. Per the City's ZIMAS, ZI No. 2452 is applicable to the Project Site. The Project is an infill affordable housing development, consisting of 166 dwelling units within a HQTA and a TPA. As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	
AGRICULTURAL RESOURCES	
Impact AG-1 Potential for the Plan 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 *State CEQA Guidelines*, 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 bank1 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.** No farmland or agricultural activity exists on or in the vicinity of the Project Site. Thus, incorporation of this mitigation measure is not required.
Impact AG-2 Potential for the Plan to conflict with existing zoning for agricultural use, or a Williamson Act contract **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 the Project Site (or for any sites within the City). Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact AG-3 Potential for the Plan 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.** Neither the Project Site nor the surrounding area is zoned for forest land, timberland, or Timberland Production. As such, the Project would not result in any conflicts any zoning related to forest land, timberland, or Timberland Production zoning. The Project Site is located in an urbanized area of the City and is currently developed with an office building and associated parking. Thus, incorporation of this mitigation measure is not required.
Impact AG-4 Potential for the Plan to result in the loss of forest land or conversion of forest land to non-forest use See PMM AG-3, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM AES-1, above.
Impact AG-5 Potential for the Plan 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	**No mitigation applies.** The Project Site is located in an urbanized area of the City and is currently developed with a medical office building, restaurant building, and associated parking. The Project Site is currently not used for any agricultural uses and is not forest land and as such, no agricultural use or forest land would be converted. Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
or intermittent interruption 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	
Impact AQ-1 Conflict with or obstruct implementation of the applicable air quality plan No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact 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 *State CEQA Guidelines*, 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 could	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar measures associated with existing regulations, that are equal to or more effective than this mitigation measure, identified by SCAQMD and CARB to facilitate consistency with plans for attainment for NAAQS and CAAQS, as applicable and feasible. 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; - 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.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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	• Construction activity on unpaved surfaces shall be suspended when wind speed exceeds 25 miles per hour (mph) (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 SCAQMD Rule 1113, the following measures shall be incorporated into Project plans and specifications: • The contractor shall use architectural coatings that average 50 g/L VOC content or less. • The development shall utilize low VOC cleaning supplies. 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. • All diesel-powered off-road construction equipment greater than 50 horsepower shall meet USEPA Tier 4 or higher emissions standards. In addition, all construction equipment shall be outfitted with BACT

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. 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.	devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a CARB-defined Level 3 diesel emissions control strategy for a similarly sized engine. • All diesel-powered construction equipment shall use CARB Level 2 or higher diesel particulate filters. • When possible, electricity shall be utilized from power supply sources rather than temporary gasoline or diesel power generators, as feasible.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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.	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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	
Impact AQ-3 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard See PMM-AQ-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM AQ-1, above.
Impact AQ-4 Expose sensitive receptors to substantial pollutant concentrations See PMM-AQ-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM AQ-1, above.
Impact AQ-5 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
No mitigation measures required.	
BIOLOGICAL RESOURCES	
Impact 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 *State CEQA Guidelines*, 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 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	**No mitigation applies.** The Project Site is located in a developed, urban area and would replace an office building and associated parking. Neither the Project Site nor the surrounding properties contain any sensitive or protected habitat/species. 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 or U.S. Fish and Wildlife Service, or the California Native Plant Society. Thus, incorporation of this mitigation measure into the Project is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. 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.	
Impact BIO-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans,	**No mitigation applies.** The Project is located in a developed, urban area and would replace existing development. There is no riparian habitat or other sensitive natural community located on or near the Project Site.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service **PMM BIO-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 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. 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-beaming mammals, are actively using the areas in conjunction with breeding activities.	Therefore, development of the Project would not result in adverse effects to any riparian habitat or other sensitive habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. 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).	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact 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 **PMM BIO-3**: 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 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 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	**No mitigation applies.** No protected wetlands or other such habitat that are under the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies are located on or near the Project Site. Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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 -- 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.	
Impact 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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM BIO-4.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
PMM BIO-4: 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 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 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 with 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	The Project Site is located in a developed urban area, and the Project would replace existing development. The Project Site and surrounding area are not part of a wildlife corridor or in proximity to any native wildlife nursery sites. The Project Site is currently developed with an office building and associated parking. As identified in the *Tree Report* prepared for the Project (refer to Appendix A), there are seven American sycamore trees (*Platanus occidentalis*), six Indian laurel trees (*Ficus nitida*), and four cajaput trees (*Melaleuca quinquenervia*) located on the Project Site. None of these trees is considered a protected tree as defined by the City. All of these trees would be removed as part of the Project. Removal of trees has the potential to impact nesting bird species, if they are present at the time of tree removal. Nesting birds are protected under the Federal MBTA (Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20) and Section 3503 of the California Department of Fish and Game Code. Removal of the trees would occur in accordance with the MBTA and state and local requirements. Thus, the Project would not harm any species protected by the Federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the Native Plant Protection Act (Chapter 10 [commencing with Section 1900] of Division 2 of the Fish and Game Code), or the California Endangered Species Act (Chapter 1.5 [commencing with Section 2050] of Division 3 of the Fish and Game Code). Specifically, in conformance with the MBTA, tree removal activities would take place outside of the nesting season (February 1 to September 1) to the greatest extent practicable. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted, or a nesting bird survey is to be completed prior to construction to document all active bird nests. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact BIO-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance **PMM BIO-5:** 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 conflicts with local policies and ordinances protecting biological resources, as applicable and 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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM BIO-5. The Project Site is located in a developed urban area, and the Project would replace existing development. The Site contains 14 street trees (4 on Sunset, 10 on Reservoir), and none onsite. None of the trees are protected species.[35] The trees will be within the construction site and impact the ability to build the building to the property line as planned. Any tree removal will comply with the City's Tree Replacement Program (Urban Forestry Division, Bureau of Street Services for the street tree). In addition, the Project would comply with the City's existing Protected Tree Ordinance that is similar to PMM BIO-5. Thus, development of the Project would not conflict with any local policies or ordinances protecting biological resources.

35 Street Tree Report, Arborgate Consulting, Inc., April 9, 2019.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact BIO-6 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **PMM BIO-6:** 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 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.	**No mitigation applies.** The Project Site is not subject to any provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Thus, incorporation of the mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
CULTURAL RESOURCES	
Impact 3.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 **PMM CULT-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 related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to CEQA Guidelines 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	Based on the evidence and analysis described in Section 2 of this SCPE, the City, as lead agency and as a CLG, determines that the Transit Priority Project will not cause a substantial adverse change in the significance of Taix French Restaurant as an historical resource pursuant to Section 21084.1 of CEQA. Substantial evidence establishes that: (a) a legacy business may constitute a historical resource in and of itself, and its significance as a resource may be distinguished from the premises in which the resource is located; (b) Taix French Restaurant constitutes a historical resource whose significance is in its continuity as a legacy business; rather than in its physical premises; (c) the premises of Taix French Restaurant do not constitute its significance as a historical resource and their demolition will not materially impair the significance of Taix French Restaurant as a historical resource; (d) approval of the Transit Priority Project will enable the preservation of Taix French Restaurant as a historical resource by avoiding its permanent closure and providing a new facility, sized to meet the current needs of Taix French Restaurant and designed by the Taix family, with upgraded and code compliant infrastructure, outdoor dining, which the Taix family has determined will be financially viable to operate in terms of its size and format; (e) disapproval of the Transit Priority Project would result in significant and unavoidable adverse impacts to Taix French Restaurant as a historical resource because it would result in the permanent closure of the restaurant and thus the permanent loss of the historical resource; and (f) Taix French Restaurant is designated as a City of Los Angeles Historic-Cultural Monument and, as a historically significant legacy business, will remain eligible for inclusion in the California Register of Historical Resources after the Transit Priority Project is implemented. Based on the administrative record and the foregoing findings, the City as lead agency and as a CLG further finds that the Transit Priority Project will not: (i) Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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.	in the California Register of Historical Resources; (ii) Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code; and (iii) demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources. No mitigation measures are necessary.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic 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	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
recognized scientific or 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.	
Impact 3.5-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5 See PMM CULT-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM CULT-1, above.
Impact 3.5-3 Disturb human remains, including those interred outside of dedicated cemeteries	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar measures that are equal

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
PMM CULT-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 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 provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with	to or more effective than PMM CULT-2. 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 would ensure that potential human remains would be handled properly. • 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: – 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 NAHC. The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. – 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. • If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	
ENERGY	
No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
GEOLOGY AND SOILS	
Impact 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 Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact 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 *State CEQA Guidelines*, 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 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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM GEO-1. 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 a Geotechnical Investigation Report that the City require of the Project Applicant for the Project. Specifically, as required by LAMC Section 91.7006, a design-level geotechnical report shall be reviewed and approved by LADBS that incorporates the recommendations of these existing reports 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 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

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	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 erosion. The Project would also be designed to comply with the City's LID Ordinance.
Impact 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, liquefaction, or collapse No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact 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 No mitigation measures required	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact 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 measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact GEO-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature **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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM GEO-2. The Project would be required to comply with existing regulations related to the discovery of unknown

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
and should consider mitigation 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: a) 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. b) 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. c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: 1. 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. 2. 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. If paleontological resources are discovered during excavation, grading, or construction, LADBS shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
GREENHOUSE GAS EMISSIONS	
Impact GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
PMM GHG-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 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 State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. 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:	to or more effective than PMM GHG-1, such as the City's Green Building Code, which incorporates the CALGreen requirements identified in the mitigation measure. To determine the Project's specific energy and water use, an Energy & Water Efficiency Compliance Memo has been prepared (Appendix G: Energy and Water Efficiency Compliance Report). The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, high performance building envelop walls, roof, and floor, glazing windows, reduction of lighting power density with the use of high-efficacy LED lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems heat-pumps with SEER (seasonal energy efficiency ratio) =16 or higher, and centralized domestic hot water system with 95% thermal efficiency and a 50% solar thermal system. The efficiency measures result in 17.3 percent less energy than Title 24 requirements. The Project would utilize low flow water fixtures that achieves and exceeds the City of Los Angeles' water conservation goals. This was achieved with features such as energy star appliances for dishwasher and clothes washers, low flow faucets and fixtures (see table for targets), water-saving pool features (pool covers), water efficient drip irrigation systems and weather based-controllers-and drought-tolerant native plantings for landscaping. The water savings features results in a 73.9 percent water savings than the regional average household water use. 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 the Project-related mitigation identified by SCAG. Thus, application of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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; 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;	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
x. Provide bicycle parking; xi. Limit or eliminate park supply; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; 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; 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:	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact GHG-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases See PMM GHG-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM GHG-1, above.
HAZARDS AND HAZARDOUS MATERIALS	
Impact 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 State CEQA Guidelines, 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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PM HAZ-1. 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. All such materials would be transported, used, and disposed of in conformance with all applicable regulatory requirements, thereby eliminating the risk of potentially significant hazards. In addition, Project operation does not involve the routine transport, use, or disposal of potentially hazardous materials. Any potentially hazardous materials used would be similar to any other urban residential development, and may include cleaning solvents, paints, and

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. -- 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.	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 regulations.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact 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 **PMM HAZ-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 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:	**No mitigation applies.** The Project does not include the shipment of flammable liquids and other hazardous materials and does not include any rail transportation. Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact 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 **PMM HAZ-3:** 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 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.	**No mitigation applies.** Cisneros Learing Academy (1018 Mohawk Street) is located within 0.25 miles of the Project Site. However, as discussed previously, the City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than 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. All such materials would be transported, used, and disposed of in conformance with all applicable regulatory requirements, thereby eliminating the risk of potentially significant hazards. In addition, Project operation does not involve the routine transport, use, or disposal of potentially hazardous materials. Any potentially hazardous materials used would be similar to any other urban residential development, and may include cleaning solvents, paints,

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	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 regulations. Thus, application of this mitigation measure is not required.
Impact 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 State CEQA Guidelines, 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 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.	**No mitigation applies.** As part of the Phase I ESA, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. 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 sites or facilities at the Project Site were listed in the databases. Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment, and, this mitigation measure does not apply. The Project would use best management practices (BMPs) and Project Mitigation MM-Hazard-1 regarding potential soil hazards. Potential risks to residents, visitors, and employees on the Project Site will be minimal during operation of the Project. To further minimize risks associated with ACMs and LBP any identified asbestos will be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations. In addition, any identified LBP will be abated in accordance with applicable City, State, and federal regulations. The Project would include a commitment to the preparation and enforcement of a SMP that would provide safety guidance and protocols for contractors of potentially impacted soils or groundwater that may be

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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	encountered at the Project Site during construction. The commitment of the SMP will be included in the Conditions of Approval for the Project.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. 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:	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact 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 See PMM NOISE-1, below.	**No mitigation applies.** The Project Site is not located within two miles of a public airport or public use airport. Thus, incorporation of this mitigation measure is not required.
Impact HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan **PMM HAZ-5:** 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 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.	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM HAZ-5. Specifically, the LAFD would require that the Project Applicant submit an emergency response plan to the LAFD as part of LAFD's review of the Project plans as part of the standard building permit review process per LAMC Section 57.118. 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. Thus, the Project would not impair implementation of or physically interfere within an adopted emergency response plan or emergency evacuation plan.
Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires	**No mitigation applies.** Refer to the discussion of the applicability of PMM WF-1, below.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
See Impact WF-2, below.	
HYDROLOGY AND WATER QUALITY	
Impact 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 State CEQA Guidelines, 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) 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.	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM HYD-1. 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 LARWQCB and the City. The Project would comply with LAMC Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills. Project construction activities would require grading, excavation, and foundation permits or approvals from the City, which would include requirements and standards designed to limit erosion. The Project would also be designed to comply with the City's LID Ordinance. Prior to the issuance of grading permits, the Applicant would submit a LID Plan to LASAN Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. 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. Compliance with the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and minimize soil erosion and sedimentation from entering the storm drains during the construction period. During operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires replace or creates more than 500 square feet of impervious area. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. 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.	required to capture and treat the runoff volume produced by the 85th percentile storm event 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. Compliance with the LID Plan and Stormwater and Urban Runoff Pollution Control Ordinance, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Consistent with the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 181,899 and No. 183,833), the Project would be required to adhere to City discharge requirements and would implement BMPs meant to reduce stormwater pollution during demolition, grading, and construction activities.
Impact 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 State CEQA Guidelines, 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:	**No mitigation applies.** The Project Site is fully developed with impervious surfaces (an office building and associated parking) and is not a significant area of groundwater recharge. Thus, incorporation of this mitigation measure into the Project is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. b) 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 surfaces, including the use of in-lieu fees and off-site mitigation. c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	
Impact HYD-3a Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on-or off-site See PMM HYD-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM HYD-1, above.
Impact HYD-3b Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of flooding on- or off-site See PMM HYD-1 and PMM HYD-2, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM HYD-1 and PMM HYD-2, above.
Impact HYD-3c Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river 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 See PMM HYD-1 and PMM HYD-2, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM HYD-1 and PMM HYD-2, above.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
Impact 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 State CEQA Guidelines, 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.** The Project Site has a very low potential for inundation by seiche, tsunami, or mudflow. The Project Site is located approximately 14 miles away from the Pacific Ocean, with no nearby major waterbodies. Therefore, risks associated with seiches or tsunamis at the Project Site would be considered extremely low. 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. Thus, incorporation of this mitigation measure is not required.
Impact HYD-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan See PMM HYD-2, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM HYD-2, above.
LAND USE AND PLANNING	
Impact LU-1 Potential for the Plan 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 State CEQA Guidelines, 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:	**No mitigation applies.** The Project does not include the development of new roadway facilities and would not otherwise physically divide a community. Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
-- 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. -- 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.	
Impact 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 State CEQA Guidelines, 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.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM LU-2. The Project would comply with existing regulations that have been identified and are required by the City as the Project is consistent with applicable regional and local land use plans, policies, and regulations. The Project Site is zoned [C2-1VL and is located within the Silver Lake – Echo Park – Elysian Valley Community Plan area with a land use designations of Community Commercial. The Project Site is also located within an HQTA and a TPA. The Project would comply with all applicable zoning regulations. Also, the Project would be consistent with applicable objectives and policies set forth in the City's planning and land use documents, including the General Plan Framework Element, General Plan Housing Element,

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
	Community Plan, Planning and Zoning Code, and the Los Angeles Green Building Code. Therefore, the Project would not result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project.
MINERAL RESOURCES	
Impact 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 State CEQA Guidelines, 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. 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	**No mitigation applies.** The Project Site is not located within the Los Angeles Downtown Oil Field, a MRZ-2 Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.[36] Therefore, the Project would not 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. Thus, incorporation of this mitigation measure is not required.

[36] *ZIMAS, City of Los Angeles, Parcel Profile Report, March 2021.*

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact 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 See PMM MIN-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM MIN-1, above.
NOISE	
Impact 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 State CEQA Guidelines, 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 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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM NOISE-1. The Project would be required to comply with existing City regulations listed below related to noise that are substantially similar to the relevant portions of PMM NOISE-1. • 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, except where compliance with this standard is technically infeasible. • The Project shall prohibit Project construction activities between the hours of 9:00 PM and 7:00 AM, Monday through Friday; before 8:00 AM or after 6:00 PM on any Saturday; and on any Sunday or national holiday, pursuant to LMAC Section 41.40(a). • The Project shall prohibit any amplified noises, especially those from outdoor sources, from exceeding the ambient noise levels of adjacent properties by more than 5 dBA, pursuant to LAMC Section 112.01. Any amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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	Project's property line, as the Project is located within 500 feet of residential zones. • The Project shall prevent HVAC systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA, pursuant to LAMC Section 112.02(a).

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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 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.	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact NOISE-2 Generation of excessive groundborne vibration or groundborne noise levels **PMM NOISE-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 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 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.	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM NOISE-2. The Project would be required to comply with LAMC Section 91.3307.1, which requires adjoining public and private property to be protected from damage during construction, remodeling and demolition work. Groundborne vibration at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (such as refuse trucks and transit buses) on nearby local roadways. The Project would not result in a substantial increase of these heavy-duty vehicles on the adjacent roadways, as solid waste is currently collected at the Project Site and would be collected in the same manner for the proposed residential uses.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact 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 See PMM NOISE-1, above	**No mitigation applies.** Refer to the discussion of the applicability of PMM NOISE -1, above. Also, the Project Site is not located within two miles of an airport.
POPULATION AND HOUSING	
Impact POP-1 Induce a 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 project-level mitigation measures were identified for this issue.	**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 would not 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. The Project includes the construction of 166 multi-family residential units on the Project Site (including 24 units set aside as Extremely Low Income units). This increase in housing would not be considered a substantial increase in housing for the area as the addition of 166 new multi-family residential units is within the anticipated housing increases based on SCAG projections for housing. As such, housing and population growth associated with the Project would not constitute substantial unplanned growth. 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.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
Impact 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 State CEQA Guidelines, 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.** Noise housing is located on the Project Site, and no housing would be displaced as a result of the Project. Thus, incorporation of this mitigation measure into the Project is not required.
PUBLIC SERVICES	
Impact PSF-1 Result in substantial adverse physical impacts associated with 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 See PMM PSP-1, below.	**No mitigation applies.** Refer to the discussion of the applicability of PMM PSP-1, below. Also, the Project would be required to comply with fire protection design standards, as necessary, per the California Building Code, California Fire Code, LAMC, and the LAFD, to ensure adequate fire protection. Key components of the regulatory requirements (from the CBC, California Fire Code, and LAMC) that would be implemented as part of the Project pursuant to LAFD review and guidance include the following:

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
	• Building Design: Fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet Code requirements. • Fire Safety Features: Installation of automatic sprinkler systems, smoke detectors, and appropriate signage and internal exit routes to facilitate a building evacuation if necessary. Installation of a fire alarm system, building emergency communication system, and smoke control system. • Emergency Safety Provisions: Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The Emergency Plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident. • LAFD Access: Access for LAFD apparatus and personnel would be provided to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles. In addition, the City requires that plans for building construction, fire flow requirements, fire protection devices (e.g. sprinklers and alarms), fire hydrants and spacing, and fire access (including ingress/egress), turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. The Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD, such that it would require the construction of a new fire station. Further, even if a new fire station, or the expansion of an existing station, was determined to be warranted by LAFD, the Project area is highly developed, and the site of a new fire station or expansion of an existing station would likely be on an infill lot that would likely be less than one acre in size and thus, would be eligible for a CEQA exemption or negative declaration.
Impact 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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM PSP-1. In accordance with existing City regulations, the Project would implement appropriate temporary security

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
PMM PSP-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 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.	features during construction (such as installation of chain link fencing and security lighting around the Project Site). Further, during operation, the Project would provide perimeter lighting to provide increased visibility and security, parking access control, and residential units access control. These measures would provide defensible spaces designed to reduce opportunity crime and ensure safety and security. Thus, the Project would not generate a demand for additional police protection services that could exceed LAPD's capability to serve the Project Site. Therefore, the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios.
Impact PSS-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered education facilities, need for new or physically altered education 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.	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM PSS-1. The Project Applicant would be required to pay developer fees to the LAUSD as required by law and which considered full and complete mitigation, pursuant to SB 50 and California Government Code Section 65995.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact 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.** The Project Site is located in an urbanized area of the City that is already served by several existing libraries, including: Edendale Branch Library, Echo Park Branch Library, De Neve Branch Library, and Silver Lake Branch Library. While the Project's residential population could result in an increased demand for library services, the Project would not create the need for new or altered library facilities. Thus, incorporation of this mitigation measure is not required.
RECREATION	
Impact REC-1 Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated **PMM REC-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 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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM REC-1. Specifically, any demand for 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. Additionally, the Project Applicant would be required to pay an in-lieu fee to the City for the purpose of developing park and recreational facilities, in accordance with Ordinance 184,505 (Parks Dedication and Fee Update). Therefore, 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

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
Impact 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 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*** See PMM REC-1, PMM AQ-2, and PMM NOISE-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM REC-1, PMM AQ-2, and PMM NOISE-1, above.
TRANSPORTATION	
Impact TRA-1 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact TRA-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3(b)	The Project substantially conforms to this mitigation measure. As shown in Appendix I-1: Transportation Impact Analysis), based on the VMT analysis, the Project is anticipated to have a significant impact based

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
PMM TRA-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 related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • 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	on its residential component (daily household VMT per capita). Thus, additional TDM strategies beyond those included as Project features were explored to reduce the Project's daily household VMT per capita (8.8) below the East Los Angeles APC significance threshold for daily household VMT per capita (7.2). The Project proposes to: (1) reduce the Project parking supply from the City Municipal Code requirement of 300 parking spaces (per Municipal Code Section 12.21.A4) to 220 parking spaces, and (2) integrate unbundled parking as part of the development, thereby separating the cost of renting a residential dwelling unit from the cost to rent a parking space. See **Performance Standard TRANS-1**. Applying the reduced parking supply strategy and unbundled parking strategy (with an assumed monthly parking space cost of $150), the VMT Calculator determined that the Project would generate the following with-mitigation trip estimates: 894 daily vehicle trips and 5,130 daily VMT. Based on the 5,130 daily VMT, the VMT Calculator determined that the Project would generate 6.3 daily household VMT per capita. This value falls below the East Los Angeles APC area threshold of significance of 7.2 daily household VMT per capita. Therefore, the provision of a reduced parking supply and unbundled parking would reduce the Project's daily household VMT per capita to a less-than-significant level. **Performance Standard TRANS-1:** **Transportation Demand Management (TDM) Strategies:** (1) reduce the Project parking supply from the City Municipal Code requirement of 300 parking spaces (per Municipal Code Section 12.21.A4) to 220 parking spaces, and

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	(2) integrate unbundled parking as part of the development, thereby separating the cost of renting a residential dwelling unit from the cost to rent a parking space. As noted in Appendix I-2: LADOT Letter, t o off-set the expected significant impacts identified in the project's transportation assessment study, LADOT recommends that the applicant be required to implement the TDM strategies of reducing the parking supply and unbundling parking as mitigation measures. Reducing the parking supply encourages alternative transportation choices by project residents and employees. Unbundling parking costs from property costs would require those who wish to purchase parking spaces to do so at an additional cost from the property cost. This removes the burden from those who do not wish to utilize a parking space. An assumption is made that the parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces. The Project Applicant will be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits.
Impact 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 measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact TRA-4 Result in inadequate emergency access ***Impact WF-1 Substantially impair an adopted emergency response plan or emergency evacuation plan*** **PMM TRA-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 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:	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than Mitigation Measure PMM TRA-2. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of Engineering, and LAFD standards and requirements for design and construction. Also, prior to issuance of a building permit, the Project Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. -- 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.	The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. Prior to issuance of a building permit, the Project Applicant would be required by the City to develop an emergency response plan in consultation with the LAFD. The emergency response plan shall include but not be limited to: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Through compliance with these City requirement, the Project would not result in inadequate emergency access and would not impair an adopted emergency response plan or emergency evacuation plan.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
-- 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	
Impact TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource 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*** See PMM CULT-1, above. **PMM TCR-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 on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than Mitigation Measure PMM TRC-1. The Project Site is in an urbanized area of the City, is currently developed, and has been developed with various uses in its history, resulting in disturbance of the upper level of soil at the site. No tribal cultural resources are known to exist at the site. Additionally, the City would require the Project Applicant to comply with the City's Standard Condition of Approval for the Inadvertent Discovery of Unknown Tribal Cultural Resources, which requires the following: • 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 at (213) 978-1454.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.	- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact 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

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
	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 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.
UTILITIES AND SERVICE SYSTEMS	
Impact 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 ***Impact USSW-2 Comply with federal, state, and local management and reduction statues and regulations related to solid waste*** **PMM USSW-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 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. 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	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM USSW-2. 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 ColWMP, pursuant to which landfill disposal needs and capacity are continually evaluated as part of the preparation of the ColWMP Annual Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent ColWMP (the 2019 Annual Report for Los Angeles County) states that no solid waste disposal capacity shortfall is anticipated within the next 15 years under current conditions.[37] The City's 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.

37 *County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, December 2019, page 37.*

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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. 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.	The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.[38] 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 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 C&D waste to the maximum extent possible pursuant to Ordinance No. 181,519 (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 would ensure that the Project's waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving consistency with this mitigation measure. Project construction waste would be hauled by permitted haulers and taken only to City-certified construction and demolition (C&D) processing facilities that are monitored for compliance with existing regulations. Project-generated C&D waste would represent a very small portion of the waste disposal capacity in the region. In addition, waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's Zero Waste Plan goal of achieving a 90 percent solid waste diversion rate by 2025.

38 *LASAN, Recycling, 2021, 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&_afrLoop=10870014375826670#!., accessed March 2021.*

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
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.	
Impact 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 See PMM HYD-1, above. **PMM-USWW-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 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 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.	**No mitigation applies.** Wastewater treatment for the Project Site is accommodated at the Hyperion Treatment Plant, which has a current available treatment capacity of 175 million gallons per day (mgd). The report estimates that the Project would generate approximately 0.023 mgd of wastewater per day, representing approximately 0.05 percent of the available treatment capacity. Thus, the Hyperion Treatment Plant would have adequate capacity to accommodate the Project's wastewater generation, and relocated or new facilities would not be required. Regarding storm drain facilities, the Project Site is served by the City's existing storm drain system. The Project Site in its existing condition is largely impervious; this would not change a result of the Project. As a result, the amount of runoff from the Project Site as a result of the Project would not alter (either less or more) than existing runoff levels, and relocated or new storm drains would not be required. Thus, incorporation of this mitigation measure is not required.
Impact 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 See PMM USWW-1, above	**No mitigation applies.** Refer to the discussion of the applicability of PMM USWW-1, above.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
Impact 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 State CEQA Guidelines, 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. 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.	**No mitigation applies.** The Project could be adequately served by the existing infrastructure, and relocation or new infrastructure would not be required. Thus, incorporation of this mitigation measure is not required.
Impact USWS-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years See PMM USWS-1, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM USWS-1, above.
WILDFIRE	

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
Impact WF-2 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 **Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires** **PMM WF-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 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 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.	**No mitigation applies.** The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.
Impact WF-3 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 See PMM HAZ-4, above.	**No mitigation applies.** The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.

Table 4-2
Mitigation Measures from Prior EIR (2020-2045 RTP/SCS)

Impacts and Mitigation Measure	Applicability to the Project
PMM WF-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 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; -- 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.	
Impact WF-4 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 See PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4, above.	**No mitigation applies.** Refer to the discussion of the applicability of PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4, above.
Source: SCAG, 2020-2045 RTP/SCS Final EIR, Mitigation Monitoring and Reporting Program, adopted May 2020.	

Section 5
Performance Standards

5.1 Residential

The Project shall not contain any more than 200 dwelling units.

5.2 Energy and Water Efficiency

The project shall be designed to be 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations and to achieve 25 percent less water usage than the average household use in the region.

5.3 Historic Resources

Performance Standard Historic-1:

- Prior to the development of final construction plans, the applicant shall ensure a historic preservation professional meeting the qualifications for architectural history or historic architecture outlined in Title 36 of the Code of Federal Regulations, Part 61 has reviewed and confirmed:
    - The three physical features (billboard, cocktails sign, and cherry wood bar) are clearly and properly identified on the demolition plans;
    - The demolition plans include detailed notes for careful removal and protection of the three physical features.
    - The construction plans include detailed drawings for reinstallation of the features in a manner that would not damage or destroy them or put them at risk of damage in the future.
- The applicant shall identify an appropriate climate-controlled and locked storage location for the three physical features (billboard, cocktails sign, and cherry wood bar) during construction that will prevent damage, vandalism, or theft. The applicant shall also identify an appropriate method to safely transport the features to this location. The location and transportation information shall be provided to a historic preservation professional meeting the qualifications for architectural history or historic architecture outlined in Title 36 of the Code of Federal Regulations, Part 61 to review and confirm.
- The applicant shall conduct a training for the construction team to ensure all workers that will be on the site are aware of the physical features, their significance, and their need for protection.
- Prior to the commencement of demolition of the buildings on the site, the applicant shall retain a qualified contractor or practitioner experienced with historic buildings and historic building elements to carefully remove the three physical features (billboard, cocktails sign,

and cherry wood bar) from their existing locations prior to construction of the proposed Project.

- Following the completion of the proposed construction, the applicant shall retain a qualified contractor or practitioner experienced with historic buildings and historic building elements to install the three physical features (billboard, cocktails sign, and cherry wood bar) in their proposed new locations in a manner that does not damage or destroy the features or put them at risk of damage in the future.

5.4 Hazards and Hazardous Materials

Performance Standard HAZARD-1:

A Soil Management Plan (SMP) shall be prepared that addresses the management of the lead impacted soil, the potential segregation of "landfill cover" soil from "unrestricted use soil," and management of any potentially impacted soil that might be encountered during excavation. The SMP would assess the lateral and vertical extent of lead in soil at boring B5. Based on the soil vapor data, a vapor mitigation (in accordance with LAMC and EPA requirements for vapor intrusion into indoor air spaces) may be required underneath the restaurant building when it becomes accessible. These procedures would include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and properly removal and disposal procedures.

5.5 Transportation

Performance Standard TRANS-1

Transportation Demand Management (TDM) Strategies

(1) reduce the Project parking supply from the City Municipal Code requirement of 300 parking spaces (per Municipal Code Section 12.21.A4) to 220 parking spaces, and

(2) integrate unbundled parking as part of the development, thereby separating the cost of renting a residential dwelling unit from the cost to rent a parking space.