Appendix J

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

APPENDIX J

Project Consistency with SCAG 2020-2045 RTP/SCS

Public Resources Code (PRC) Section 21155.2, which implements the Sustainable Communities Strategy requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable Environmental Impact Reports (EIR), including the 2020-2045 RTP/SCS Program EIR (RTP/SCS PEIR), which was certified in September 2020. The RTP/SCS PEIR identifies mitigation measures that have been incorporated to avoid, reduce, and mitigate significant impacts of the RTP/SCS. In the RTP/SCS Mitigation Monitoring and Reporting Program (SCAG MMRP), the Southern California Association of Governments (SCAG) identified mitigation measures that are considered "SCAG Mitigation Measures" and "Project-Level Mitigation Measures". Project-Level Mitigation Measures are provided "as suggested approaches to help jurisdictions and project proponents achieve the collective goal of mitigating impacts at the project level". SCAG states that the identified Project-Level Mitigation Measures are not intended to be exclusive nor prescriptive in nature or application.

In accordance with the requirements set forth in PRC Section 21155.2, the Lead Agency, the City of Los Angeles, has reviewed all of the mitigation measures in the SCAG MMRP, and determined their applicability to the Project. The SCAG MMRP includes various mitigation measures, both at the regional level that would be implemented by SCAG and at the project level that would be implemented by the lead agency. Regional mitigation measures would be implemented by SCAG (marked as SMM in the MMRP) and are therefore not discussed herein. Table 1 below focuses on the Project's consistency with the MMRP's project-level mitigation measures (marked as MM in the MMRP). The City has evaluated the applicability of each such project-level mitigation measure to the proposed project and has determined whether to use the SCAG MMRP or an equally effective City mitigation measure or federal, state, regional, or City regulation.

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
Aesthetics (AES)		
AES-1: Potential to have a substantial adverse effect on a scenic vista.	**SCAG MM-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	**Not Applicable.** Senate Bill (SB) 743 enacted Public Resources Code (PRC) Section 21099, which sets forth new guidelines for evaluating project transportation impacts under CEQA: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within Transit Priority Area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines "transit priority area" as an area within 0.5 mile of a major transit stop, an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area, and an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 confirms the Project Site's location within a TPA and provides further instruction concerning the definition of transit priority projects and that "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 shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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)	PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. Regardless of PRC Section 21099, it is noted that there are no views of mountains, the beach or Pacific Ocean, or other such similar scenic vistas available from the Project Site or the streets immediately surrounding the Project Site. Therefore, the Project would result in less than significant impacts on scenic vistas. As such, the Project would have no impact with respect to aesthetics and therefore no mitigation measures are required.
AES-2: Potential to substantially degrade the existing visual character.	**SCAG MM-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: 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	**Not Applicable.** As described above, 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." Regardless of PRC Section 21099, it is noted that the impact associated with AES-2 has been revised in the CEQA Guidelines Appendix G checklist since the RTP/SCS was published. The checklist now analyzes if, for projects in an urbanized area, the project would conflict with applicable zoning and other regulations governing scenic quality. The Project would not conflict with any such regulation. Therefore, no impacts would occur and no mitigation measures are required.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: - use transparent panels to preserve views where sound walls would block views from residences; - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; - 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	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.	
AES-3: Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Potential to result in shade and shadow impacts.	**SCAG MM-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.	**Not Applicable.** As described above, 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." Regardless of PRC Section 21099, it is noted that the Project would adhere to the City's regulatory compliance measures governing light, including LAMC Sections 12.21.A.5(k), 14.4.4.E, and 93.0117, and design standards would require outdoor lighting to be designed and installed with shielding so that the source of the light (e.g., the bulb) cannot be seen from adjacent residential properties, the public right-of-way, nor from above so as to minimize light trespass. The Project would result in less than significant impacts regarding light. The Project would incorporate both solid and glass surfaces; exterior building materials would use various non-reflective material designed to minimize the transmission of glare from building. Compliance with the City's existing regulations, including LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor areas of residential units from being illuminated by more than two foot

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	candles, or from receiving direct glare from the light source, would ensure glare impacts are not significant. The Project would not result in a significant impact with respect to light or glare and therefore no mitigation measures are required.
Agriculture and Forestry Resources (AG)		
AG-1, 3, 4, 5: Conversion of Farmland to a Non-Agricultural Use; Conversion of Forest Land	**SCAG MM-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 bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural	**Not Applicable.** The Project Site is located in a developed area of the City. According to the State Farmland Mapping and Monitoring Program's most recent Farmland mapping data for Los Angeles County, neither the Project Site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[1] The Project Site is zoned [Q]C4-2D-O (Commercial – 2D Height District – Oil Drilling District). The Project Site is not zoned for forest land, timberland, or timberland production land uses. Therefore, no impacts would occur and no mitigation measures are required.

[1] *State of California Department of Conservation, Division of Land Resource Protection, California Important Farmland Finder, website: https://maps.conservation.ca.gov/DLRP/CIFF/, accessed October 2021.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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. **SCAG MM-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. **SCAG MM-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,	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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. **SCAG MM-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	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary 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.	
AG-2: Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract.	**SCAG MM-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 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.	**Not Applicable.** The Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. Additionally, according to the State's most recent Williamson Act land data, neither the Project Site nor surrounding area are under a Williamson Act contract.[2] Therefore, no impacts would occur and no mitigation measures are required.
Air Quality (AQ)		
AQ-1: Potential to violate any air quality standard or contribute substantially to an existing or	**SCAG MM-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	**Not Applicable.** This mitigation measure is not incorporated, because the City has determined that the existing regulatory measures listed

[2] *State of California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, The California Land Conservation Act of 19652016 Status Report, published December 2016.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
projected air quality violation.	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 be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable	below would apply to the Project and are comparable to the measures identified in SCAG RTP/SCS Program EIR MM-AQ-1. Specifically, applicable regulatory compliance measures are those identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible, as set forth below: - Site Clearing, Grading and Construction Activities: Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: • All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. • The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. • All clearing, earth moving, or excavation activities shall be discontinued during periods of high

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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	winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. • All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. • All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. • General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. • Trucks having no current hauling activity shall not idle but be turned off. - In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. - In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards. - The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings. - The Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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 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	- The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138. - New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review. The mitigation measures related to airport projects, rail projects, port projects, and projects within 500 feet of freeways are not relevant to the Project as it involves a residential development. Furthermore, 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. Accordingly, no mitigation is required.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	including ZE/ZNE technologies where appropriate and feasible. r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v) As applicable for airport projects, the following measures should be considered: a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w) As applicable for port projects, the following measures should be considered: a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.	

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	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. 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	

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	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 ow-income and/or minority communities.	
Biological Resources (BIO)		
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	**SCAG MM-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	**Not Applicable.** As discussed previously in Section 2, Sustainable Communities Strategy Criteria, the Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans,

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regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	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: o Impact minimization strategies o Contribution of in-lieu fees for in-kind conservation and mitigation efforts o Use of in-kind mitigation bank credits o Funding of research and recovery efforts o Habitat restoration o Establishments of conservation easements o Permanent dedication of habitat a) 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-	policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No such species or habitats are known to occur at the Project Site per local or regional plans by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity. The Project Site is not located near undeveloped natural/undisturbed open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species. Furthermore, the Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[3] Therefore, the Project would have no impacts on sensitive biological species or habitat and no mitigation measures are required.

[3] *California Department of Fish and Wildlife, California Regional Conservation Plans, April 2019.*

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	site long-term conservation strategies. b) 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. c) 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. d) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. e) 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. f) Appoint a qualified biologist to monitor implementation of mitigation measures. g) 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. h) Develop an invasive species control plan associated with project construction. i) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species	

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	and other best management practices appropriate for potential local sensitive wildlife. j) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance. k) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
BIO-2: 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.	**SCAG MM-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 Endangered Species Act. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for	**Not Applicable.** As discussed previously in Section 2, Sustainable Communities Strategy Criteria, no riparian or other sensitive habitats are located on the Project Site. Neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Therefore, implementation of the Project would not result in adverse impacts to riparian habitat or other sensitive natural communities and no mitigation is required.

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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 Migratory Bird Treaty Act during the breeding season. f) 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. g) Require project design to avoid sensitive	

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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.	

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
BIO-3: Potential to have a substantial adverse effect on federally protected 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	**SCAG MM-BIO-2.** **SCAG MM-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	**Not Applicable.** The Project Site is currently developed with a vacant five-story commercial office use, and an associated surface parking lot. The Project Site itself does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act.[4] Therefore, no impacts to riparian or wetland habitats would

[4] *U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: https://www.fws.gov/wetlands/data/mapper.html, accessed October 2021.*

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
other means.	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 wetlands consistent with the provisions of Section 404 of the Clean Water Act, 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 State Water Quality Control Board (SWRCB), applicable Regional Water Quality Control Board (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	occur with implementation of the Project and no mitigation measures are required.

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: ○ Permittee-responsible mitigation ○ Contribution of in-kind in-lieu fees ○ Use of in-kind mitigation bank credits 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	

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	○ 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 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.	**SCAG MM-BIO-1, SCAG MM-BIO-2, and SCAG MM-BIO-3.** **SCAG MM-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	**Not Applicable.** Due to the condition and location of the Project Site, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. There are three (3) existing street trees in the parkway adjacent to the Project Site. Removal of all street trees in the public right-of-way would occur in accordance with the policies of the Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division. Removal of all street trees in the public right-of-way would require approval of the Board of Public Works, and two of the existing street trees would be replaced subject to approval from the Urban Forestry Division. These trees may provide temporary suitable habitat for nesting migratory birds, which are protected under MBTA. The Project would be required to comply with existing federal and State laws (i.e., MBTA and California Fish and Game Code, respectively). Therefore, no impacts would occur and no mitigation measures are required.

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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 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	

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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, where applicable:	

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	○ Wildlife movement buffer zones ○ Corridor realignment ○ Appropriately spaced breaks in center barriers ○ Stream rerouting ○ Culverts ○ Creation of artificial movement corridors such as freeway under- or overpasses ○ Other comparable measures p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.	
BIO-5: Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	**SCAG MM-BIO-1, SCAG MM-BIO-2, SCAG MM-BIO-3, and SCAG MM-BIO-4.** **SCAG MM-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	**Not Applicable.** There are no trees subject to protection as defined by Article 6, Sec. 46.01 of the LAMC, which identifies oak, black walnut, western sycamore, and California bay trees as protected trees.[5] There are three existing street trees. Two of these trees are proposed to be replaced. Types of trees and planting locations would be reviewed and approved by the Bureau of Street Services' Urban Forestry Division. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other

[5] *6435 Wilshire Boulevard, Los Angeles LNDG Job #200-781, L. Newman Design Group, Inc., June 28, 2021, found in **Appendix F** of this document.*

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris	approved local, regional, or State habitat conservation plan.[6] Therefore, no impacts would occur and no mitigation measures are required.

[6] *California Department of Fish and Wildlife, California Regional Conservation Plans Map, April 2019, website: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed October 2021.*

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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.	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources. i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: o Avoidance strategies o Contribution of in-lieu fees o Planting of replacement trees o Re-landscaping areas with native vegetation post-construction o Other comparable measures developed in consultation with local agency and certified arborist	
BIO 6: Potential to conflict with the	**SCAG MM-BIO-6:** In accordance with provisions of	**Not Applicable.** The Project Site and its vicinity

Table 1
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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	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.	are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[7] Therefore, no impacts would occur and no mitigation measures are required.
Cultural Resources (CULT)		
CULT-1, 2: Potential to cause a substantial adverse change in the	**SCAG MM-CULT-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State	**Consistent.** As discussed in Section 2, Sustainable Communities Strategy Criteria, and

[7] *California Department of Fish and Wildlife, California Regional Conservation Plans Map, April 2019, website: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed October 2021.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
significance of a historical resource; 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.	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	in conformance with relevant provisions of MM-CULT-1, a historic resource assessment (HRA) was prepared for the Project Site and concluded that the subject property is not considered a "historical resource" as defined in Section 15064.5(a) of the CEQA Guidelines.[8] Accordingly, no impacts to historic resources would result. Based on a review of City Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site is not within proximity of an area of known archaeological sites or archaeological survey areas.[9] However, even though the Project Site is located in a highly urbanized area of the City and has been subject to past disturbance, previously unknown archaeological resources, including tribal cultural resources, may exist beneath the Project Site that could be uncovered during Project excavation and grading activities. Thus, the potential exists for the unanticipated discovery of archaeological materials, including tribal cultural resources. To address and reduce impacts from such potential inadvertent discoveries, the following City of Los Angeles standard conditions of approval have been incorporated as Project Measures, which the City has determined are equal to or more effective than this SCAG mitigation measure. • **PM-CULT-1: Tribal Cultural Resource Inadvertent Discovery**. In the event that

[8] *Historical Resources Assessment for 6435 Wilshire Boulevard, prepared by Chattel, Inc. on March 3, 2020, found in **Appendix H** of this document.*

[9] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.*

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	Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: o Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. o Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. 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,	objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), 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: o Upon a discovery of a potential tribal cultural resource, the Applicant 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) 978-1222. o 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 to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of

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	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	any discovered tribal cultural resources. o The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible. o The Applicant 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 and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City. o If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic 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	costs associated with the mediation. o The Applicant 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 by a culturally affiliated tribal monitor and determined to be reasonable and appropriate. o Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. • **PM-CULT-2: Human Remains Inadvertent Discovery**. In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal

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	activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.	remains are discovered during construction or during any ground disturbance actives, the following procedures shall be followed: o Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays) o If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). o The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. o The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods. o If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. **PM-CULT-3: Archaeological Resources**

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	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	**Inadvertent Discovery**. In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Thus, through compliance with the City's standard conditions of approval regarding the inadvertent discovery of archaeological resources, tribal cultural resources, or human remains, which have been incorporated as

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	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.	Project Measures, the Project will be consistent with this SCAG mitigation measure, and no impacts will occur.
CULT-3: Potential to disturb human remains, including those interred outside of formal cemeteries, including Native American Sacred Sites.	**SCAG MM-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: o Contact the County Coroner to contact the	**Consistent.** It is unknown whether human remains are located at the Project Site. Any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. Even so, should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC Section 5097), relating to the disposition of Native American burials would be required. The regulatory compliance would ensure any found burials are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21074. These regulatory requirements are also reflected in the City's standard

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	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 appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	conditions of approval regarding inadvertent discovery of tribal cultural resources and human remains (see PM-CULT-1 and PM-CULT-2, discussed above). Through compliance with these conditions of approval, which have been incorporated as Project Measures, the Project will be consistent with this SCAG mitigation measure and no impacts will occur.
Geology and Soils (GEO)		
GEO-1: Directly or indirectly cause	**SCAG MM-GEO-1:** In accordance with provisions of	**Consistent.**

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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.	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 minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and	As described in the Project's Geotechnical Report, included as **Appendix I.1**, the Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone or a fault zone mapped by the State Geologist pursuant to the Seismic Hazard Mapping Act. Additionally, the Project Site is not located within a City-designated Fault Rupture Study Area, as identified by the City.[10] No active faults are known to pass through the immediate Project vicinity. The Project Site is also not within a City-designated Hillside Area, a landslide zone, a fault rupture study area, or a tsunami inundation zone.[11] The Project Site is located within an area designated as having a potential for liquefaction.[12] As described in the Project's Geotechnical Report, included as **Appendix I.1,** historic high groundwater depth is 18 feet below the ground surface and the groundwater encountered at the Project Site was 39.5 to 43 feet below the ground surface. Furthermore, the Project is located in the seismically active region of Southern California and is susceptible to ground shaking during a seismic event. However, the Project would be required to comply with the existing building, grading, and seismic regulations of the City's Building Code, which incorporates the Uniform Building Code (UBC) and California Building

[10] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org/, accessed May 2022.*
[11] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org/, accessed May 2022.*
[12] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org/, accessed May 2022.*

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	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.	Code (CBC). All required excavations would be sloped, or properly shored, in accordance with the provisions of the California Building Code and additional Los Angeles Building Code requirements, as applicable, as well as the Site- and Project-Specific recommendation contained in the Geotechnical Report, included as **Appendix I.1**. The Project would also be required to comply with the permitting requirements of LADBS. Pursuant to LAMC Section 91.7006, the Project would be required to provide a final design-level geotechnical report, subject to LADBS review and approval prior to the issuance of grading permits for the Project. The final geotechnical report would include the primary recommendations of the Geotechnical Investigation, included as **Appendix I.1**, and the final design-level recommendations from that report would be incorporated in the Project and enforced by LADBS. In accordance with the recommendations of the Geotechnical Report and the preparation and approval of a final geotechnical report, the Project would not cause or accelerate geologic hazards related to soils that would become unstable as a result of the Project and potentially result in on- or off-Site landslides, lateral spreading, subsidence, liquefaction, or collapse. The Project would not result in related impacts and therefore no mitigation is required. Nevertheless, the Project by design complies with the mitigation measure.

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GEO-2: Potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features.	**SCAG MM-GEO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation 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	**Consistent.** As discussed in the Geotechnical Report (included as **Appendix I**) prepared for the Project Site, no unique geologic features are located on the Project Site, which is developed with a vacant five-story commercial office use, and an associated surface parking lot. The Project Site and immediate surrounding area do not contain any known vertebrate paleontological resources;[13] However, the Project Site and surroundings are within an area identified as surface sediments with unknown fossils potential.[14] Although the Project Site has been previously disturbed and no paleontological resources have been identified on the Project Site or in the vicinity, the Project would require additional ground disturbance, which could result in the inadvertent discovery of previously unknown paleontological resources. To address and reduce impacts from such potential inadvertent discoveries, the following City of Los Angeles standard condition of approval has been incorporated as a Project Measure, which the City has determined is equal to or more effective than this SCAG mitigation measure. **PM-CULT-4: Paleontological Resources Inadvertent Discovery**. In the event that any prehistoric subsurface cultural resources are encountered at the project site during

[13] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles.*

[14] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-3 – Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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: o 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. o A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during 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	construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Thus, through compliance with the City's standard condition of approval regarding the inadvertent discovery of paleontological resources, which has been incorporated as a Project Measure, the Project will be consistent with this SCAG mitigation measure, and no impacts will occur.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP. o 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. o 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	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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 and Climate Change (GHG)		
GHG-1: Potential to conflict with AB 32 and or any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.	**SCAG MM-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: o Use energy efficient materials in building design, construction, rehabilitation, and retrofit; o Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. o Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. o Incorporate passive environmental control systems that account for the characteristics of the natural environment. o Use high-efficiency lighting and cooking	**Consistent:** The Project's generation of greenhouse gas (GHG) emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Specifically, as set forth in the PRC Section 21155 consistency findings for the Project as well as the RTP/SCS consistency findings, the Project is consistent with SCAG's regional plan for reducing GHG emissions. Therefore, no significant GHG emission impacts would occur for the Project. Additionally, as described in **ENR-2**, the Project would be in compliance with the PRC's statutory requirements to be designed to be 15 percent more energy efficient than the applicable Title 24 standards and to be designed to achieve 25 percent less water usage than the average household use in the region. Specifically, as stated in the CEQA Exemption Energy and Water Efficiency Compliance Technical Report (**Appendix B**), the Project's energy use would be 16.8 percent less than the standards required by Title 24, Part 6 (2019). Moreover,

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	devices; o Incorporate passive solar design. o Use high-reflectivity building materials and multiple glazing. o Prohibit gas-powered landscape maintenance equipment. o Install electric vehicle charging stations. o Reduce wood burning stoves or fireplaces. o Provide bike lanes accessibility and parking at residential developments. 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: o Use energy and fuel-efficient vehicles and equipment; o Deployment of zero- and/or near zero emission technologies; o Use lighting systems that are energy efficient, such as LED technology; o Use the minimum feasible amount of GHG-emitting construction materials; o Use cement blended with the maximum	the Project's water use would be 66.5 percent below the regional baseline. Therefore, the Project would result in reduced energy consumption and corresponding reduction in GHG emissions, consistent with **MM-GHG-1.** In accordance with new CAL-Green requirements, the Project includes the required 15 percent of the total roof areas as solar-ready. The proposed landscaping plan provides a mix of ground cover and trees to complement the architecture. Plant material has been selected for temperature hardiness and low water use. Overall water consumption will be minimized with the inclusion of water efficient appliances and fixtures throughout the development. Further, the Project location reduces GHG emissions by placing 68 residential units (approximately 159 residents[15]) within walking distance to local Metro and AVTA lines, and to light rail access. Furthermore, as demonstrated in the Transportation Assessment prepared for the Project by Linscott Law & Greenspan (see **Appendix K**), the Project would not conflict with measures of effectiveness for the performance of the circulation system. Specifically, the Project would not conflict with or be inconsistent with applicable City transportation plans or policies, would not result in any impacts pertaining to vehicle miles traveled (VMT), and would not result in any increased hazards due

[15] *Based on rate of 2.25 persons per market-rate multi-family dwelling unit (2.25 x 61 = 137) and 3.14 persons per affordable multi-family dwelling unit (3.14 x 7 = 22) for a total of 159 (137 + 22 = 159). Source: City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1, page 10.*

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	feasible amount of flash or other materials that reduce GHG emissions from cement production; o Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; o Incorporate design measures to reduce energy consumption and increase use of renewable energy; o Incorporate design measures to reduce water consumption; o Use lighter-colored pavement where feasible; o Recycle construction debris to maximum extent feasible; o Plant shade trees in or near construction projects where feasible; and o 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: o Promote transit-active transportation coordinated strategies; o Increase bicycle carrying capacity on transit and rail vehicles; o Improve or increase access to transit; o Increase access to common goods and services, such as groceries, schools, and day care; o Incorporate affordable housing into the	to a geometric design feature. In addition, the Project would comply with applicable vehicular and bicycle parking requirements. During operation, the Project would encourage the utilization of transit due to its close proximity to existing bus lines and future Metro Purple Line Stations in the vicinity of the Project Site. Therefore, these Project features 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 MM-GHG-1.

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	project; o Incorporate the neighborhood electric vehicle network; o Orient the project toward transit, bicycle and pedestrian facilities; o Improve pedestrian or bicycle networks, or transit service; o Provide traffic calming measures; o Provide bicycle parking; o Limit or eliminate park supply; o Unbundle parking costs; o Provide parking cash-out programs; o 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; 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: o Provide car-sharing, bike sharing, and ride-sharing programs; o Provide transit passes; o Shift single occupancy vehicle trips to carpooling or vanpooling, for example	

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	providing ride-matching services; o Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; o Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; o Provide employee transportation coordinators at employment sites; o 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: o Developing on infill and brownfields sites; o Building compact and mixed-use developments near transit; o Retaining on-site mature trees and vegetation, and planting new canopy trees; o Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and o Measures to reduce GHG emissions from solid waste management through	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	encouraging solid waste recycling 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.	
Hazards and Hazardous Materials (HAZ)		
HAZ-1: Potential to create a significant hazard to the public or the environment through: routine transport, use, or disposal of hazardous materials.	**SCAG MM-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 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	**Consistent:** 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 would be used in connection with the Project would be typical of those used in other residential 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 are 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 would 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 and no mitigation measures are required.

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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: o The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. o The location of such hazardous materials. o An emergency response plan including employee training information. o A plan that describes the 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.	

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident. o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified. p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses	

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.	
HAZ-2: Potential to 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.	**SCAG MM-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: 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	**Not Applicable.** As described above, during construction, all potentially hazardous materials encountered and used at the Project Site would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. This ensures that potential risks associated with construction related activities are minimized. A PEA for the Project evaluated possible ingestion, inhalation, and dermal exposure routes of the contaminants at the Project Site to possible human receptors which included future residents, and occupational and construction workers.[16] As indicated in the PEA, no potential risks to residents, visitors, and employees on the Project Site were identified during construction or operation of the Project. In addition, as reflected in the PEA, an inspection of the Project Site conducted in January 2022 revealed the presence of both ACM and LBP in the Project Site's existing building; accordingly, as recommended by the Phase I ESA and PEA, such materials would be abated and safely removed from the Project Site in connection with the development of the Project. As required by existing regulations,

[16] *Preliminary Endangerment Assessment Report Wilshire Redevelopment, 6435 Wilshire Boulevard, Los Angeles, CA 90048, by Partner Engineering and Science, Inc, April 2022, found in* ***Appendix G*** *of this document.*

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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.	including but not limited to SCAQMD Rule 1403 and Title 17 of the California Code of Regulations, all removal and abatement of ACM and LBP will be conducted in compliance with all required protocols. Such regulatory compliance would also be consistent with **SCAG MM-HAZ-4** and its recommended protocols regarding the removal of ACM and LBP. Accordingly, through compliance with applicable regulatory requirements, the identification and removal of ACM and LBP will not result in the potential for exposure to significant health hazards at the Project Site.
HAZ-3: Potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school.	**SCAG MM-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. b) Where it is not feasible to avoid transport of	**Not Applicable.** As described above, during construction and operation, the Project would not emit or handle hazardous materials or substances other than those typically used in other residential developments.

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	
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.	**SCAG MM-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	**Not Applicable:** 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 including Leaking Underground Storage Tank Sites, Solid Waste Disposal Sites, Active Cease and Desist Orders, and Cleanup and Abatement Orders. No hazardous materials that may pose a risk at or to 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. As described under HAZ-2, potential risks to residents and visitors on the Project Site would be minimal during operation of the Project. However, to further minimize risks associated with ACMs and LBP, an investigation for ACMs would be conducted and any identified asbestos would be abated in accordance with the SCAQMD's rule 1403, as well as other applicable City, State, and federal regulations.

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory	In addition, prior to demolition activities, an investigation for LBP would be conducted and any identified LBP would be abated in accordance with applicable City, State, and federal regulations. In conclusion, the Phase I did not identify any RECs and no further evaluation was needed for the Project Site, including the completion of a Phase II. Therefore, no mitigation is required.

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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 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	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
HAZ-5: Potential to impair implementation of or physically interfere with an adopted emergency	**SCAG MM-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	**Not Applicable:** There are no critical facilities in the immediate vicinity of the Project Site.[17] Nonetheless, as detailed in the Traffic

[17] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems. in the City of Los Angeles, Adopted November 1996.*

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
response plan or emergency evacuation plan.	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	Assessment, found in **Appendix K**, the Project would not result in any significant traffic impacts. 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 would be submitted to LAFD during review of plans as part of the standard building permit process. Furthermore, no full road closures of any of the surrounding roadways, including Wilshire Boulevard, are anticipated during construction of the Project. Access for emergency service providers and any evacuation routes would be maintained during construction and operation, pursuant to LAMC guidelines, including the Fire Code and City Building requirements. Therefore, impacts would be less than significant and no mitigation measures are required.
Hydrology and Water Quality (HYD)		
HYD-1: Potential to violate any water quality standards or waste discharge requirements; alteration of site drainage pattern; runoff exceeding stormwater drainage system capacity; otherwise degrade water quality.	**SCAG MM-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	**Consistent:** The Project is required to comply with LARWQCB Order No. R4-2012-0175, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of BMPs, including, but not

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to	limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction, and the City's LID Ordinance. As such, the Project would achieve consistency with mitigation measure through compliance with existing regulatory compliance measures, and no impacts on water quality would occur.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	and feasible.	
HYD-2: Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).	**SCAG MM-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: 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.	**Not Applicable.** Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. The City imports the majority of its potable water supply from sources outside the Los Angeles Basin. The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. Additionally, operation of the Project would not require continual dewatering or otherwise interfere with any groundwater recharge activities within the area. Under the Project, the amount of impermeable surface area would be increased comparatively. According to the Geotechnical Report (included as **Appendix I** to this document), the historically highest groundwater level recorded in this area of Los Angeles is 18 feet below the ground surface and the groundwater encountered at the Project Site was 39.5 to 43 feet below the ground surface. Therefore, the construction and operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge and the Project would not impede sustainable groundwater management of the West Coast groundwater basin.

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
HYD-4: Potential to place structures within a 100-year flood hazard area that would impede or redirect flood flows; risk due to levee or dam failure; risk due to seiche, tsunami, or mudflow.	**SCAG MM-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.	**Not Applicable.** According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site designated to be outside the 100-year flood hazard area.[18] Thus, the Project Site is not located within a designated 100-year flood plain area, and the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. Therefore, no impacts related to flooding would occur and no mitigation measures are required.
Land Use and Planning (LU)		
LU-1: Potential to physically divide an established community.	**SCAG MM-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	**Not Applicable.** The Project would not physically disrupt or divide the surrounding established community. The Project would involve the development of an underutilized site surrounded on four sides by commercial and residential development with a mixed-use structure that will provide 68 residential units. The Project would not cause any permanent street closures, block access to any surrounding land uses, or cause any change in the existing

[18] *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1605F, effective September 26, 2008, website: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd, accessed October 2021.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	patterns. b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: o Selecting alignments within or adjacent to existing public rights of way. o 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. o 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: o Alignment shifts to minimize the area affected. o Reduction of the proposed right-of-way take to minimize the overall area of impact. o Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	street grid system. Since the Project would be developed within a long-established urban area, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Impacts would be less than significant and no mitigation measures are required.
LU-2: Potential to physically divide an established community and the 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,	**SCAG MM-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	**Not Applicable.** The Project Site has a General Plan Land Use Designation of Regional Center Commercial. The existing [Q]C4-2D-O zoning designation is consistent with this land use designation. The Project would not involve a General Plan amendment or zone change. The Project is consistent with the existing General

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	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.	Plan designation of Regional Center Commercial as it proposes a residential project within close proximity to a variety of public transit options. The Project would be consistent with the applicable objectives and policies set forth in the City's plans and zoning including the General Plan, Community Plan, Planning and Zoning Code, Los Angeles Green Building Code, and the Walkability Checklist. The Project would be consistent with all local plans and zoning while fulfilling regional priorities of developing residential uses in close proximity to high quality transit. 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 and no mitigation measures are required.
Mineral Resources (MIN)		
MIN-1: Potential to result in the loss of availability of a known mineral resource; potential to result in the loss of availability of a locally important mineral resource recovery site.	**SCAG MM-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	**Not Applicable.** The Project Site is not located within an MRZ-2 zone.[19] However, it is located within a major drilling area and State-designated oil field.[20] The Project would not involve mineral extraction activities or oil drilling activities, nor are any such activities presently occurring on the Project Site. Therefore, no impact would occur and no mitigation measures are required.

[19] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, adopted June 2001.*
[20] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, adopted June 2001.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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: o Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. o Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. o Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. o Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in	

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Noise		
NOISE-1: Result in exposure of persons to or generation of noise levels in excess of local standards; substantial permanent increase in noise level, substantial temporary increase in noise levels.	**SCAG MM-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 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	**Consistent.** The Project will substantially conform to this mitigation measure through required compliance with applicable noise regulations as well as incorporation of relevant measures from MM-NOISE-1 intended to reduce increases in existing ambient noise levels resulting from the Project's construction activities, as set forth in Project Measure PM-NOISE-1 below. : **PM-NOISE-1:** • Construction and demolition shall be restricted to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday, pursuant to LAMC Section 41.40. • Construction staging areas for the Project Site shall be as far from sensitive receptors as possible. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best

Table 1
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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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	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 is not idling 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.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned. l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses. n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g.,	• Impact pile drivers will not be used. Furthermore, Project-related operational noise sources such as roof-top air conditioning units, a ground-floor pad-mounted transformer, and ground floor parking structure vehicle movements will be required to comply with the City of Los Angeles' Building Code, Section 91.1207.14.2, which requires the Project to provide sufficient noise attenuation measures to achieve the 45 dBA CNEL interior noise level standard. Furthermore, the Project would be required to comply with LAMC Section 112.02's noise level standards, which restrict noise level increases from exceeding 5 dBA over the existing or presumed ambient noise level at an adjacent property line. In addition, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five dBA. Through required compliance with regulatory requirements as well as implementation of above Project Measure, , which the City has determined will be equal to or more effective than MM-NOISE-1, the Project will be consistent with this mitigation measure.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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	

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Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible. y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.	
NOISE-2: Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	**SCAG MM-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	See NOISE-1 for a discussion with MM NOISE-1. **Consistent.** The Project would be consistent with MM NOISE-2 due to its compliance with existing regulations, including LAMC Section 91.3307.1., which requires adjoining public and private property to be protected from damage during construction, remodeling and demolition work, as well as incorporation of relevant measures from MM-NOISE-2 intended to avoid adverse vibration-related effects, as set forth in Project Measure PM-NOISE-2, below: **PM-NOISE-2:** • All new construction work shall be performed so as not to adversely affect the structural integrity of the adjacent buildings. Prior to commencement of

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	construction, the applicant shall retain a qualified structural engineer to survey the existing foundations and structures of the adjacent buildings, and provide a plan to protect them from potential damage. The performance standards of the structure monitoring plan shall including the following: a) Documentation shall consist of video and/or photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings. A registered structural engineer shall develop recommendations for the adjacent structure monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect the adjacent structures from construction-related damage. b) The monitoring program shall survey for vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, or noticeable structural damage becomes evident to the project contractor, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to historic resources.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
		c) The structure monitoring program and initial survey documentation shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the project prior to construction. With implementation of the above measures as well as compliance with existing regulatory requirements, which the City has determined are equal to or more effective than MM-NOISE-2, the Project will be consistent with this mitigation measure.
Population, Housing, and Employment (POP)		
POP-1: Potential to displace substantial amount of existing housing; potential to displace substantial number of people and the 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).	**SCAG MM-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	**Not Applicable.** The Project would involve the demolition of a vacant five-story commercial office use, which was previously operating as a school, and an associated surface parking lot. Therefore, the Project would not result in the displacement of a substantial amount of housing units or number of people. Conversely, the Project would add housing units in a transit-rich environment, consistent with state policy and regional goals as established by SCAG. Therefore, no impacts would occur and no mitigation measures are required. The Project would generate approximately 159 residents.[21] According to SCAG data, the City of Los Angeles subregion had a total population of 4,059,665 persons in 2018. Extrapolations of

[21] *Based on rate of 2.25 persons per market-rate multi-family dwelling unit (2.25 x 61 = 137) and 3.14 persons per affordable multi-family dwelling unit (3.14 x 7 = 22) for a total of 159 (137 + 22 = 159). Source: City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1, page 10.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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.	SCAG projections estimate that the subregional population is expected to increase by 382,835 between 2018 and 2035, and by 549,735 persons between 2018 and 2040.[22] The addition of the new residents housed by the Project would be within the SCAG growth projection, representing approximately 0.04 percent of the Citywide total growth for the period of 2018 to 2035, and approximately 0.03 percent of the Citywide total growth for the period of 2018 to 2040. This increase would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population. With respect to housing, the Project would introduce 68 new apartment units including 7 affordable units set aside for Extremely Low Income Households. According to SCAG data, the City of Los Angeles subregion had 1,480,426 total housing units in the City in 2018. Estimates extrapolated from SCAG data projects the Citywide housing supply to increase by 138,474 units between 2018 and 2035, and by 209,874 units between 2018 and 2040. The 68 housing units proposed would be within the growth anticipated based on SCAG projections, representing approximately 0.05 percent of the Citywide total housing growth for the period of 2018 to 2035, and approximately 0.03 percent of the Citywide total growth for the period of 2018 to 2040. This increase would not be considered a substantial increase in housing for the area as the addition of 68 new affordable

[22] *Southern California Association of Governments, 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction, accessed September 2020.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
		residential units is within the anticipated housing increases based on SCAG projections for housing. The Project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. Conversely, the Project is specifically designed, consistent with state policy and SCAG established goals, to maximize the efficiency of existing infrastructure by developing housing in established communities. As such, the Project would not induce substantial population growth, either directly or indirectly and no mitigation measures are required.
Public Services (PS)		
PSP-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.	**SCAG MM-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: a) 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	**Consistent.** The fire station with the nearest engine company is Fire Station No. 61, located at 5821 W. 3rd Street, approximately 1.8 roadway mile to the northeast from the Project Site.[23] LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, shall comply with Table 57.507.3.3 of the LAMC. Based on such requirements, the maximum response distance for the High Density Residential land use category from fire stations with an engine company is 1.5 miles, and the maximum response distance from fire stations with a truck company is 2.0 miles. Where a response

[23] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org/, accessed October 2021.*

Table 1
Applicability and Compliance of Project-Level Mitigation Measures from the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	response services and that any required additional construction of buildings is incorporated in to the project description. b) 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. c) 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.	distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. Therefore, the Project Site is within the 2-mile response distance standard of a station with a truck engine, but not within the 1.5-mile response distance of a station with an engine company. The Project would implement City Building and Fire Code requirements regarding Project components including, but not limited to, structural design, building materials, site access, clearance, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. LAMC Section 57.507.3.1 identifies a fire flow requirement of 4,000 gallons per minute (gpm) flowing from 4 hydrants simultaneously for high density residential and commercial neighborhood land uses such as the Project. The adequacy of existing water pressure and Availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow; however, no new water facilities are anticipated. Moreover, such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way, and as such, the construction activities would be temporary and not result in any significant environmental

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
		impacts. Based on the above, the addition of a new fire facility, or the expansion, consolidation, or relocation of existing facilities, is not anticipated or needed to maintain service and, therefore, the potential for physical impacts associated with construction of fire and police facilities would be less than significant.
PSP-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 public protective security services.	**SCAG MM-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: a) 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. b) 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. c) Project sponsors can and should develop traffic control plans for individual projects. Traffic	**Consistent.** The police station serving the Project Site is the Wilshire Community Police Station, located at 1663 Butler Avenue, approximately 2.8 roadway miles to the southeast from the Project Site.[24] As required by the City as a regulatory compliance measure, the Project would employ construction safety features including erecting temporary fencing 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 deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. The LAPD would review the Project design and provide guidance on design features that would minimize the opportunity for crime, which would minimize demand for police protection services. Design features that deter crime, including adequate and strategically positioned functional lighting in parking areas, pathways, and facing the adjacent alleyway to enhance public safety and minimizing visually obstructed and infrequently accessed “dead zones” reduce the

[24] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org/, accessed October 2021.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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.	demand for police services. These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or 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 police protection. Impacts related to police protection would be less than significant and no mitigation measures are required.
PSS-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 schools services.	**SCAG MM-PSS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable to mitigate identified CEQA impacts.	**Consistent.** The Leroy F. Greene School Facilities Act of 1998 ("SB 50") sets a maximum level of fees a developer may be required to pay to address a project's impacts on school facilities. SB 50 is deemed to fully address school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local law. Therefore, as payment of appropriate school fees to LAUSD is required by law and considered to fully address impacts, impacts would be less than significant and no mitigation measures are required.
PSL-1 Potential to cause substantial	**SCAG MM-PSL-1:** In accordance with provisions of	**Consistent.** The *L.A. CEQA Thresholds Guide*

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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 library services.	sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as applicable to mitigate identified CEQA impacts.	considers whether a project includes features that would reduce demand for library services (e.g., on-site library facilities or direct support to the LAPL). The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.[25,26,27] In addition, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. In addition, the Project Applicant would pay a $200 per capita fee to LAPL. These funds would be used for staff, books, computers, and other library materials. Essentially, the provision of library services is the responsibility of local government, which is typically financed through the City general funds. Fees would be paid by the Project Applicant, as applicable. Therefore, combined with the LAPL standards for new development and the fees to help to pay for any improvements that the LAPL may do in the future impacts to library facilities would be

[25] *National Endowment for the Arts, "To Read or Not to Read," Research Report 47, November 2007.See page 10: "Literacy reading declined significantly in a period of rising internet use."*
[26] *Denise A. Troll, Distinguished Fellow, Digital Library Federation, "How and Why are Libraries Changing?", January 9, 2001.*
[27] *Calro Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," August 2003.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
		less than significant and no mitigation measures are required.
Recreation (REC)		
REC-1: Increase use or physical deterioration of recreational facilities.	**SCAG MM-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 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: o Increasing the accessibility to natural areas for outdoor recreation. o Utilizing “green” development techniques. o Promoting water-efficient land use and development. o Encouraging multiple uses, such as the	**Consistent. T**he Project would introduce 159 new residents to the area. The Project would provide common open space in conformance with LAMC Section 12.21G and would provide a variety of active and passive open space and recreational amenities to serve the needs of Project residents and visitors. Furthermore, the following parks and recreational facilities are available to serve the Project Site: Carthay Circle Park, Oakhurst Mini Park, La Cienega Park, Shanyka’s Wislhire Green Park, Lower Circle Carthay Park, Mansfield Avenue Park, and Reeves Park. Each of these facilities is within 2 miles of the Project Site. The Project applicant would be required to pay the City's required Parks Fee for the Project, which are intended to mitigate potential impacts on park facilities. Project development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the area. It is anticipated that the Project will not impact existing recreational facilities or require the construction or expansion of existing facilities. Therefore, impacts on recreational facilities would be less than significant and no mitigation measures are required.

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	joint use of schools. o Including trail systems and trail segments in General Plan recreation standards.	
Transportation, Traffic, and Safety (TRA)		
TRA-1: Potential to conflict with the established measures of effectiveness for the performance of the circulation system, by increasing the daily Vehicle Miles Traveled (VMT), taking into account all 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.	**SCAG MM-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: a) 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: o include TDM mitigation requirements for new developments; o incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;	**Consistent.** The nature of the Project addresses the overarching policy goal of reducing VMT-related emissions by encouraging the use of public transit through compliance with development standards that prioritize residential development in close proximity to the transit system and infrastructure. As detailed in the Traffic Assessment, found in **Appendix K**, the Project is expected to generate three (3) net new vehicle trips (-9 inbound trips and 12 outbound trips) during the weekday AM peak hour when compared to the prior use. During the weekday PM peak hour, the Project is expected to generate seven (7) net new vehicle trips (5 inbound and 2 outbound) when compared to the prior use. Using the most recent version (Version 1.3) of the City of Los Angeles VMT Calculator, over a 24-hour period, the Project is forecast to result in 150 net new daily trip ends during a typical weekday when compared with the prior use on the Project Site. Per the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines[28], July 2020 (TAG), as the Project is expected to generate less than 250 net new daily vehicle trips, it was concluded that no further analysis is

[28] *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, LADOT, July 2020.*

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	○ provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; ○ implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; ○ develop TDM-specific performance measures to evaluate project-specific and system-wide performance; ○ incorporate TDM performance measures in the decision-making process for identifying transportation investments; ○ implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and set aside funding for TDM initiatives. ○ The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.	required for purposes of satisfying the requirements of CEQA. Additionally, the Project would incorporate project design features that avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies: • As an infill mixed-use development in an urban area, the Project is expected to have a higher percentage of internal and pass-by trips. Furthermore, because of its proximity to public transit a number of Project trips would be expected to be walk or transit trips rather than vehicle trips. • The Project would include 60 on-site bicycle parking spaces, which is pursuant to the standards and requirements of the City's Bicycle Ordinance. Furthermore, the Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by Los Angeles Department of Transportation (LADOT) prior to the issuance of any construction permits. The Project would submit a detailed Construction Management Plan (CMP) to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The CMP would include measures to ensure pedestrian safety along the affected sidewalks, bicycle facilities, and

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		temporary walkways (e.g., use of flag persons, rerouting, and installation of protection barriers). Therefore, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant and no mitigation measures are required.
TRA-2: Potential to result in inadequate emergency access.	**SCAG MM-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: 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	**Not Applicable:** There are no critical facilities in the immediate vicinity of the Project Site.[29] 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 would be submitted to LAFD during review of plans as part of the standard building permit process. Furthermore, no full road closures of any of the surrounding roadways, including Wilshire Boulevard, are anticipated during construction of the Project. Access for emergency service providers and any evacuation routes would be maintained during construction and operation. The Project would submit, a detailed CMP to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The CMP include measures to ensure pedestrian safety along the affected sidewalks, bicycle facilities, and temporary

[29] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

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	should include the following requirements: o Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. o Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. o Scheduling of truck trips outside of peak morning and evening commute hours. o Limiting of lane closures during peak hours to the extent possible. o Usage of haul routes minimizing truck traffic on local roadways to the extent possible. o Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. o Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. o Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access,	walkways (e.g., use of flag persons, rerouting, and installation of protection barriers). Therefore, impacts would be less than significant and no mitigation measures are required.

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	affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. o Storage of construction materials only in designated areas. o Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. o 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. o Enhance emergency preparedness awareness among public agencies and with the public at large.	
Tribal Cultural Resources (TCR)		
TCR-1: Potential to cause a substantial change in a tribal cultural resource.	**SCAG MM-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	See CULT-1, 2 for a discussion with PM-CULT-1. **Consistent.** The City has established standard conditions of approval regarding the inadvertent discovery of archaeological resources, tribal cultural resources, or human remains to address inadvertent discovery of tribal cultural resources, which would be imposed on the Project. Should tribal cultural resources be inadvertently encountered during Project

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
	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; 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.	construction, PM-CULT-1 requires the temporarily halting of construction activities near the encounter and notification of the City and any Native American tribes traditionally and culturally affiliated with the geographic area of the Project. If the City determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Project Applicant would then be required to implement the tribe's recommendations if a qualified archaeologist concludes that the tribe's recommendations are reasonable and feasible. The recommendations would be incorporated into a tribal cultural resource monitoring plan, and once the plan is approved by the City, ground disturbance activities would be permitted to resume. In accordance with this Project Measure, all related activities would be conducted in accordance with regulatory requirements. The Project Measure is intended to ensure that significant impacts to tribal cultural resources do not occur and as discussed, would be imposed on the Project. Therefore, impacts would be less than significant and no mitigation measures are required.
Utilities and Service Systems (USSW)		

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Impacts	Project-Level Mitigation Measures (Implemented by Lead Agency)	Project Applicability
USSW-2: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	**SCAG MM-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 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	**Consistent.** As required by City Ordinance No. 181,519, the construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. The Countywide Integrated Management Plan 2019 Annual Report concludes that there is current capacity of 148.40 million tons available throughout the County for the disposal of inert waste.[30] Therefore, the Project-generated demolition debris would represent a very small percentage of the inert waste disposal capacity in the region. As shown in Table 2, Estimated Daily Solid Waste Consumption (found in **Appendix L**), during Project operation, it is conservatively assumed that all 832 pounds per day of the Project's estimated solid waste generation would be disposed of at regional landfills. The average daily intake of the Sunshine Canyon Landfill is approximately 6,387 tons and the permitted daily intake is 12,100 tons per day.[31] According to the 2019 Annual Report, the Sunshine Canyon Landfill had approximately 55.2 million tons of remaining capacity.[32] As such, the landfill's permitted daily intake of 12,100 tons per day would accommodate the daily operational waste generated by the Project of 832 pounds per day. The Project would be required to comply with CalGreen and with AB 939 requirements, requiring that 50 percent of

[30] *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2019 Annual Report, September 2020, page 32.*
[31] *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2019 Annual Report, September 2020, page 67.*
[32] *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2019 Annual Report, September 2020, page 67.*

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	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	the Project's waste would be diverted for reuse or recycling. As such, the Project would comply with the mitigation measure through compliance with existing regulatory requirements. The Project would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Accordingly, impacts would be less than significant and no mitigation measures would be required.

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	k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	
USWW-1: Require or result in construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	**SCAG MM-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: a) 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	**Consistent.** The Project already conforms with this mitigation measure as it must comply with the following regulatory compliance measures that reduce impacts on utility systems: • Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. Furthermore, the Project's BMPs would be required to control stormwater runoff with no

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	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. See **SCAG MM-HYD-5.**	increase in runoff resulting from the Project Site, and runoff would continue to discharge to the surrounding stormwater infrastructure and drain to the same stormwater systems. Typical BMPs that would be implemented include: • Peak Storm Water Runoff Discharge Rate: Post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak storm water discharge rate will result in increased potential for downstream erosion; • Provide storm drain system Stenciling and Signage (only applicable if a catch basin is built on-site); • Properly design outdoor material storage areas to provide secondary containment to prevent spills; • Properly design trash storage areas to prevent off-site transport of trash; • Provide proof of ongoing BMP Maintenance of any structural BMPs installed; • Design Standards for Structural or Treatment control BMPs: • Conserve natural and landscaped areas; • Provide planter boxes and/or landscaped areas in yard/courtyard spaces; • Post-construction treatment control BMPs are required to incorporate, at minimum, either a volumetric or flow

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		based treatment control design or both, to mitigate (infiltrate, filter or treat) storm water runoff. As such, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. Therefore, the Project would not result in significant environmental effects related to the construction of new stormwater drainage facilities. Accordingly, impacts would be less than significant and no mitigation measures would be required.
USWS-1: Have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements.	**SCAG MM-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	**Not Applicable.** As analyzed in the Project's Energy and Water Efficiency Report (**Appendix B**), the Project will achieve an approximately 66.5 percent reduction in water usage as compared to the average household use in the region, which will ensure that existing water supplies and infrastructure will be sufficient to serve the Project. Per the Project's Energy and Water Efficiency Report (**Appendix B**), the Project is estimated to consume 7,001.5 gallons of water per day (7.67 AF/Y). This projected water demand from the Project falls within the LADWP 2020 UWMP's projected water supplies through 2045, representing approximately 0.001 percent of the projected water supply during average years (710,500 af/y), during single-dry years (746,000 af/y), and during projected water supplies during the first year in multiple-dry years (727,400 af/y) and for the second year in multiple-dry years (731,500

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	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.	af/y). As an additional conservative assumption, the Will Serve Letter from LADWP estimates the Project will consume 7,862 gallons per day (8.76 AF/Y).[33] This projected water demand from the Project falls within the LADWP 2020 UWMP's projected water supplies through 2045, also representing approximately 0.001 percent of the projected water supply during average years (710,500 af/y), during single-dry years (746,000 af/y), and during projected water supplies during the first year in multiple-dry years (727,400 af/y) and for the second year in multiple-dry years (731,500 af/y). Compliance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.304.2 governing water efficiency and water conservation measures, including Title 20 and 24 of the California Administrative Code, would further reduce the above projected water demand below the sewage generation factors assumed by the City's Bureau of Sanitation. As such, the Project would comply with the mitigation measure through compliance with existing regulatory requirements. Sufficient water supplies would be available to serve the Project and reasonably foreseeable future. Accordingly, impacts would be less than significant and no mitigation measures would be required.
Wildfire (WF)		

[33] *LADWP utilizes Los Angeles Bureau of Sanitation generation rates to estimate water usage. Refer to Wastewater Service Information letter received from Los Angeles Bureau of Sanitation (included as **Appendix E.2**),*

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WF-1: Have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements.	**SCAG MM-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,	**Not Applicable.** The Project Site is not located in or near a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone (VHFHSZ).[34,35] Furthermore, although the Project Site is located on a selected county- and City-designated disaster routes, neither construction nor operation of the Project would impair or physically interfere with an adopted emergency response plan.[36] Access for emergency service providers and evacuation routes would be maintained during construction. Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete. In addition, operation of the Project would not cause permanent alterations to vehicle circulation routes and patterns, or impede public access or travel upon public rights-of-way. All new development in the City is required to comply with existing fire codes and ordinances regarding emergency

[34] *City of Los Angeles Fire Department, Fire Zone Map Viewer, website: https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed October 2021.*

[35] *California Board of Forestry and Fire Protection, State Responsibility Area Viewer, website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1, accessed October 2021.*

[36] *Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles West Area, website: https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20West%20Area.pdf, accessed: October 2021; and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

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	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.	access, such as widths, surfaces, vertical clearance, brush clearance, and allowable grades. Accordingly, impacts would be less than significant and no mitigation measures would be required.
WF-2: Potential to exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from wildfire.	**SCAG MM-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.	**Not Applicable.** Construction would involve the use of some flammable materials such as gasoline, diesel fuel, hydraulic oils, paints, solvents, or other wastes. However, the probability of a wildfire to occur as a result of unmitigated Project construction would be low as the Project Site is located within an urban, developed portion of the City with low fuel load. Furthermore, all construction equipment is required to have fire suppression equipment (such as a fire extinguisher) on board or at the work site. The Project Site is not located in or near the SRA or the VHFHSZ.[37,38] Furthermore, the Project Site and surrounding area are flat and not located in a high wind velocity area[39] or downslope or downwind of a SRA or the VHFHSZ. Therefore, the Project would not have the potential to expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Accordingly, impacts would be less than significant and no mitigation measures would be required.

[37] *City of Los Angeles Fire Department, Fire Zone Map Viewer, website: https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed October 2021.*
[38] *California Board of Forestry and Fire Protection, State Responsibility Area Viewer, website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1, accessed October 2021.*
[39] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org/, accessed October 2021.*

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