

# **Sustainable Communities Environmental Assessment**

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## **IV. 2016-2040 RTP/SCS Program EIR Mitigation Measures**

### **Senate Bill 375**

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 2016-2040 RTP/SCS Program EIR (RTP/SCS PEIR), which was certified in April 2016. 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 (“City”), has reviewed all of the mitigation measures in the SCAG MMRP and determined their applicability to the Project. For each such mitigation measure, the City considered whether to use the SCAG MMRP mitigation measure or an equally effective City mitigation measure or federal, state, regional, or City regulation. The City’s applicability determination is provided in Table IV-1 below and is focused on the Project-Level Mitigation Measures as identified by the SCAG MMRP.

**Table IV-1**  
**Applicability and Compliance of Project-Level Mitigation Measures from the**  
**2016-2040 Regional Transportation Plan / Sustainable Communities Strategy**

Impacts	Project-Level Mitigation Measures	Project Applicability
<b>Aesthetics</b>		
<p><b>AES-1:</b> Potential to have a substantial adverse effect on a scenic vista.</p>	<p><b>MM-AES-1(b):</b> Consistent with the provisions of Section 15091 of the State (CEQA) Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.</li> <li>• Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.</li> <li>• Use alternating facades to “break up” large facades and provide visual interest.</li> <li>• Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.</li> <li>• Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.</li> <li>• Retain or replace trees bordering highways, so that clear-cutting is not evident.</li> </ul>	<p><b>Not Applicable.</b> As discussed in Section V.1, Aesthetics, 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 less than significant impacts on scenic vistas.</p> <p>As such, the Project would have no impact with respect to aesthetics and therefore no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.</li> </ul>	
<p><b>AES-3:</b> Potential to substantially degrade the existing visual character or quality of the site and its surroundings.</p>	<p><b>MM-AES-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p><b>Not Applicable.</b> The impact associated with AES-3 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. As discussed in Section V.1, Aesthetics, the Project would not conflict with zoning, the Venice Coastal Zone Specific Plan (VCZSP), the Venice Coastal Land Use Plan (VCLUP), the Oxford Triangle Specific Plan (OTSP), or the Los Angeles Coastal Transportation Corridor Specific Plan (LACTC).</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.</li> <li>• Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.</li> <li>• Design projects consistent with design guidelines of applicable general plans.</li> <li>• Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable.</li> <li>• 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.</li> </ul>	Therefore, impacts would be less than significant and no mitigation measures are required.
<p><b>AES-4:</b> 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.</p>	<p><b>MM-AES-4(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or minimizing the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider</p>	<p><b>Not Applicable.</b> As discussed in Section V.1, Aesthetics, 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</p>

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	<p>mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.</li> <li>• Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations.</li> <li>• Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.</li> <li>• Use unidirectional lighting to avoid light trespass onto adjacent properties.</li> <li>• Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.</li> <li>• Provide structural and/or vegetative screening from light-sensitive uses.</li> <li>• Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.</li> <li>• Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.</li> <li>• Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.</li> </ul>	<p>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 candles, or from receiving direct glare from the light source, would ensure glare impacts are not significant. Thus, the Project would result in less than significant impacts regarding glare. The Project would not result in a significant impact with respect to light or glare and therefore no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
<b>Agriculture and Forestry Resources</b>		
<p><b>AF-1, 4, 5:</b> Conversion of Farmland to a Non-Agricultural Use; Conversion of Forest Land</p>	<p><b>MM-AF-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> <li>• For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act).</li> <li>• Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.</li> <li>• Maintain and expand agricultural land protections such as urban growth boundaries.</li> </ul> <p>Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve</p>	<p><b>Not Applicable.</b> As further discussed in Section V.2, Agriculture and Forestry Resources, the Project Site is located in a developed area of the City, and prior to the Project Site being vacated in 2016 it was previously used for public facilities as a Bureau of Sanitation maintenance yard. 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.<sup>1</sup> The Project Site is zoned [Q]PF-1XL (Public Facilities – 1XL Height 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.</p>

<sup>1</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published July 2017, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed: April 2019.

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	<p>agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the conservation easement agreements are upheld. The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see <a href="https://www.wildlife.ca.gov/Conservation/Planning/Banking">https://www.wildlife.ca.gov/Conservation/Planning/Banking</a>)</p> <p>“A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permittees who need to satisfy legal requirements and compensate for the environmental impacts of developmental projects.</p> <p>A privately owned conservation or mitigation bank is a free-market enterprise that:</p> <ul style="list-style-type: none"> <li>• Offers landowners economic incentives to protect natural resources;</li> <li>• Saves permittees time and money by providing them with the certainty of pre-approved compensation lands;</li> <li>• Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values;</li> <li>• Provides for long-term protection and management of habitat.</li> </ul> <p>A publicly owned conservation or mitigation bank:</p> <ul style="list-style-type: none"> <li>• Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance.”</li> </ul> <p>In 2013, the University of California published an article entitled “Reforms could boost conservation banking by landowners” that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs.</p>	

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	<ul style="list-style-type: none"> <li>• Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.</li> <li>• Include underpasses and overpasses at reasonable intervals to maintain property access.</li> <li>• Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.</li> <li>• Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible.</li> <li>• Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.</li> </ul>	
<p><b>AF-2:</b> Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract.</p>	<p><b>MM-AF-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from conflict with existing zoning for agricultural use or a Williamson Act contract that are within the jurisdiction and responsibility of the California Department of Conservation, other public agencies, and Lead Agencies. Where the Lead Agency has identified that a project has potential for significant effects, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of agriculture and forestry resources to ensure compliance with the goals and policies established within</p>	<p><b>Not Applicable.</b> As further discussed in Section V.2, Agriculture and Forestry Resources, 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</p>

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	<p>the applicable adopted county and city general plans to protect agricultural resources consistent with the California Land Conservation Act of 1965, the Farmland Security Zone Act, and county and city zoning codes, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> <li>• Project relocation or corridor realignment to avoid lands in Williamson Act contracts.</li> <li>• 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.</li> <li>• Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.</li> </ul>	<p>the Project Site nor surrounding area are under a Williamson Act contract.<sup>2</sup> Therefore, no impacts would occur and no mitigation measures are required.</p>
<b>Air Quality</b>		
<p><b>AIR-2:</b> Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.</p>	<p><b>MM-AIR-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other</p>	<p><b>Not Applicable.</b> The Project would have a less than significant impact with respect to Air Quality (see Section V.3, Air Quality). Specifically, the Project would not result in or cause NAAQS or CAAQS violations. The Project would not result in any construction-source or</p>

<sup>2</sup> State of California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, Los Angeles County Williamson Act FY 2015/2016, published 2016, website: [ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA\\_15\\_16\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf), accessed: April 2019.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible. CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions:</p> <ul style="list-style-type: none"> <li>• Minimize land disturbance.</li> <li>• Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas.</li> <li>• Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.</li> <li>• Cover trucks when hauling dirt.</li> <li>• Stabilize the surface of dirt piles if not removed immediately.</li> <li>• Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.</li> <li>• Minimize unnecessary vehicular and machinery activities.</li> <li>• Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.</li> <li>• On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.</li> <li>• Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.</li> </ul>	<p>operational-source emissions exceedances. The Project is therefore considered to be consistent with the AQMP. Thus, the Project would not conflict with or obstruct implementation of the AQMP, and this impact would be less than significant.</p> <p>The Project would comply with all South Coast AQMD (SCAQMD) Rules that are currently applicable during construction, including but are not limited to: Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust). Best Available Control Measures (BACMs) are considered standard regulatory requirements. These SCAQMD Rules include many of the measures identified by MM-AIR-2(b) and thus would be incorporated into the Project by way of regulation.</p>

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	<ul style="list-style-type: none"> <li>• Ensure that all construction equipment is properly tuned and maintained.</li> <li>• 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.</li> <li>• Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators.</li> <li>• Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.</li> <li>• As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.</li> <li>• Implement EPA's National Clean Diesel Program.</li> <li>• Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible.</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity.</li> <li>• If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines.</li> <li>• Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines</li> <li>• Convert part of the construction truck fleet to natural gas.</li> <li>• Include “clean construction equipment fleet”, defined as a fleet mix cleaner than the state average, in all construction contracts</li> <li>• Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road)</li> <li>• Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas</li> <li>• Use diesel construction equipment meeting ARB’s Tier 4 certified engines or cleaner offroad heavy-duty diesel engines and comply with State off-road regulation</li> <li>• Use on-road, heavy-duty trucks that meet the ARB’s 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation</li> <li>• Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes. Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit.</li> <li>• Prohibit diesel idling within 1,000 feet of sensitive receptors.</li> <li>• Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.</li> <li>• The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.</li> <li>• The engine size of construction equipment shall be the minimum practical size.</li> <li>• Catalytic converters shall be installed on gasoline-powered equipment.</li> <li>• Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit.</li> <li>• Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite.</li> <li>• Use new or rebuilt equipment.</li> <li>• Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be checked by an ASE-certified mechanic and determined to be running in proper condition before it is operated.</li> <li>• Use low rolling resistance tires on long haul class 8 tractor-trailers.</li> <li>• Suspend all construction activities that generate air pollutant emissions during air alerts.</li> </ul>	

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	<ul style="list-style-type: none"> <li>Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.</li> </ul>	
<p><b>AIR-4:</b> Expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially.</p>	<p><b>MM-AIR-4(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects would be located. Where the Lead Agency has identified that a project has the potential to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s), or other comparable measures, to reduce cancer risk pursuant to the Air Toxics “Hot Spots” Act of 1987 (AB2588), as applicable and feasible. Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB’s strategy includes the following elements:</p> <ul style="list-style-type: none"> <li>Set technology forcing new engine standards.</li> <li>Reduce emissions from the in-use fleet.</li> <li>Require clean fuels, and reduce petroleum dependency.</li> <li>Work with US EPA to reduce emissions from federal and state sources.</li> <li>Pursue long-term advanced technology measures.</li> </ul> <p>Proposed new transportation–related SIP measures include:</p> <p>On-Road Sources</p> <ul style="list-style-type: none"> <li>Improvements and Enhancements to California’s Smog Check Program</li> <li>Expanded Passenger Vehicle Retirement or Modifications to Reformulated Gasoline Program</li> <li>Cleaner In-Use Heavy-Duty Trucks</li> <li>Ship Auxiliary Engine Cold Ironing and Other Clean Technology</li> <li>Cleaner Ship Main Engines and Fuel</li> </ul> <p>Port Truck Modernization</p>	<p><b>Not Applicable/Consistent.</b> As determined by the <i>Thatcher Yard Residential Air Quality Impact Analysis</i> prepared by Urban Crossroads in March 2019 (“Air Quality Report”), the Project would not produce the volume of traffic required to generate a CO “hot spot” either in the context of the 2003 Los Angeles hot spot study, or based on representative Bay Area AQMD CO threshold considerations. Therefore, CO “hot spots” are not an environmental impact of concern for the proposed Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. The Air Quality Report is available as Appendix A to this SCEA.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Accelerated Introduction of Cleaner Line-Haul Locomotives</li> <li>• Clean Up Existing Commercial Harbor Craft</li> <li>• Limited idling of diesel-powered trucks</li> <li>• Consolidated truck trips and improve traffic flow</li> <li>• Late model engines, Low emission diesel products, engine retrofit technology</li> <li>• Alternative fuels for on-road vehicles</li> <li>• Off-Road Sources</li> <li>• Cleaner Construction and Other Equipment</li> <li>• Cleaner In-Use Off-Road Equipment</li> <li>• Agricultural Equipment Fleet Modernization</li> <li>• New Emission Standards for Recreational Boats</li> <li>• Off-Road Recreational Vehicle Expanded Emission Standards</li> </ul>	
<b>Biological Resources</b>		
<p><b>BIO-1:</b> Potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.</p>	<p><b>MM-BIO-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Sections 7, 9, and 10(a) of the federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, as applicable and feasible. Additional compliance should adhere to applicable implementing regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California Department of Fish and Wildlife. Such measures may include the</p>	<p><b>Not Applicable.</b> As further discussed in Section V.4, Biological Resources, 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, 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 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</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.</li> <li>• 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 Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an Incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to protect the survival and recovery in the wild of federally and state-listed endangered species including the bald eagle: <ul style="list-style-type: none"> <li>○ Avoidance strategies</li> <li>○ Contribution of in-lieu fees</li> <li>○ Use of mitigation bank credits</li> <li>○ Funding of research and recovery efforts</li> <li>○ Habitat restoration</li> <li>○ Conservation easements</li> <li>○ Permanent dedication of habitat</li> <li>○ Other comparable measures</li> </ul> </li> <li>• Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.</li> <li>• Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources.</li> </ul>	<p>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.<sup>3</sup> Therefore, the Project would have less than significant impacts on sensitive biological species or habitat and no mitigation measures are required.</p>

<sup>3</sup> California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed: April 2019.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Appoint an Environmental Inspector to monitor implementation of mitigation measures.</li> <li>• 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.</li> <li>• Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance.</li> <li>• Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.</li> </ul>	
<p><b>BIO-2:</b> 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.</p>	<p><b>MM-BIO-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on state-designated sensitive habitats, including riparian habitats, that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 1600 of the State Fish and Game Code, USFS Land Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino, implementing regulations for the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other related federal, state, and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p>	<p><b>Not Applicable.</b> As further discussed in Section V.4, Biological Resources, 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. Although none of the on-site tree species are protected by the City's tree protection ordinance, the existing trees may provide temporary suitable habitat for nesting</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.</li> <li>• Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully-Protected Species afforded protection pursuant to the State Fish and Game Code.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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-bearing mammals, are actively using the areas in conjunction with breeding activities.</li> </ul>	<p>migratory birds, which are protected under the federal MBTA. The Project would be required to comply with these existing federal and State laws (i.e., MBTA and California Fish and Game Code, respectively). Therefore, impacts would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate.</li> <li>• Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.</li> <li>• 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.</li> <li>• Install fencing and/or mark sensitive habitat to be avoided during construction activities.</li> <li>• Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area.</li> <li>• Revegetate with appropriate native vegetation following the completion of construction activities.</li> <li>• Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).</li> <li>• Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.</li> </ul>	
<p><b>BIO-3:</b> Potential to have a substantial adverse effect on federally</p>	<p><b>MM-BIO-1(b) and MM-BIO-2(b).</b></p>	<p><b>Not Applicable.</b> The Project Site is currently a vacant paved lot in an urbanized area of the City.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
<p>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 other means.</p>	<p><b>MM-BIO-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 404 of the Clean Water Act and regulations of the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible.</li> <li>• Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB).</li> <li>• Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible.</li> </ul>	<p>Review of the National Wetlands Inventory identified the nearest mapped estuarine area is the marina of Marina del Rey, approximately 500 feet southwest of the Project Site. The Project would not directly or indirectly affect the marina. The Project does not include removal, filling, hydrological interruption, or any other affects of this nearby waterbody. Furthermore, the Project Site itself does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Therefore, no impacts to riparian or wetland habitats would occur with implementation of the Project and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>Consistent with the administration’s performance standard of “no net loss of wetlands” a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:</p> <ul style="list-style-type: none"> <li>○ Permittee-responsible mitigation</li> <li>○ Contribution of in-lieu fees</li> <li>○ Use of mitigation bank credits</li> <li>● 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.</li> </ul>	
<p><b>BIO-4:</b> 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.</p>	<p><b>MM-BIO-1(b), MM-BIO-2(b), and MM-BIO-3(b).</b></p> <p><b>MM-BIO-4(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to</p>	<p><b>Not Applicable.</b> Due to the condition and location of the Project Site, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Although none of the on-site tree species are protected by the City’s tree protection ordinance, the existing trees may provide temporary suitable habitat for nesting migratory birds, which are protected under MBTA. The Project would be required to</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and policies of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur.</li> <li>• 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.</li> <li>• 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.</li> <li>• Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.</li> <li>• Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible.</li> <li>• Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31.</li> <li>• Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by</li> </ul>	<p>comply with these existing federal and State laws (i.e., MBTA and California Fish and Game Code, respectively). Therefore, impacts would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDDB by a qualified biologist to determine the risk of habitat fragmentation.</li> <li>• Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).</li> <li>• Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible.</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern.</li> <li>• Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.</li> <li>• Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas.</li> <li>• Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: <ul style="list-style-type: none"> <li>○ Wildlife movement buffer zones</li> <li>○ Corridor realignment</li> <li>○ Appropriately spaced breaks in center barriers</li> <li>○ Stream rerouting</li> <li>○ Culverts</li> <li>○ Creation of artificial movement corridors such as freeway under- or overpasses</li> <li>○ Other comparable measures</li> </ul> </li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species.</li> <li>• Establish native vegetation within habitat pockets or the “wildling of urbanized habitats” that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.</li> </ul>	
<p><b>BIO-5:</b> Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	<p><b>MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), and MM-BIO-4(b).</b></p> <p><b>MM-BIO-5(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to</p>	<p><b>Not Applicable.</b> The landscape architect for the Project, Segal Shuart, reviewed the existing trees on site and determined that there are no trees of “protected” status as defined under City Ordinance 177,404.<sup>4</sup> Removal of all street trees in the public right-of-way would occur in accordance with the policies of the Los Angeles Department of</p>

<sup>4</sup> Segal Shuart, *Landscape Site Plan, Thatcher Yard, Entitlement Set, December 6, 2018.*

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <p>Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.</p> <ul style="list-style-type: none"> <li>• Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist.</li> <li>• 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.</li> <li>• Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree.</li> <li>• 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</li> </ul>	<p>Public Works, Bureau of Street Services, Urban Forestry Division. 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 approved local, regional, or State habitat conservation plan.<sup>5</sup> Therefore, impacts would be less than significant and no mitigation measures are required.</p>

<sup>5</sup> California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed: April 2019.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed.</li> <li>• 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.</li> <li>• Design projects to avoid conflicts with local policies and ordinances protecting biological resources.</li> <li>• 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</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>to support issuance of a tree removal permit. The consideration of conservation measures may include:</p> <ul style="list-style-type: none"> <li>○ Avoidance strategies</li> <li>○ Contribution of in-lieu fees</li> <li>○ Planting of replacement trees at a minimum ratio of 2:1</li> <li>○ Re-landscaping areas with native vegetation post-construction</li> <li>○ Other comparable measures</li> </ul>	
<p><b>BIO 6:</b> Potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>	<p><b>MM-BIO-6(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs.</li> <li>• Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program.</li> <li>• Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to</li> </ul>	<p><b>Not Applicable.</b> 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. Therefore, impacts would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in MM-BIO-1(b), where applicable.	
<b>Cultural Resources</b>		
<b>CUL 1:</b> Potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features.	<b>MM-CUL-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: <ul style="list-style-type: none"> <li>Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require</li> </ul>	<b>Not Applicable/Consistent.</b> As discussed in Section V.7, Geology and Soils, no unique geologic features are located on the Project Site, which is a vacant and paved lot. The Project Site and immediate surrounding area do not contain any known vertebrate paleontological resources. <sup>6</sup> The Project Site and surroundings are within an area identified as surface sediments with unknown fossils potential. <sup>7</sup> 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. If previously unknown paleontological

<sup>6</sup> 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.

<sup>7</sup> 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.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature.</p> <ul style="list-style-type: none"> <li>• Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources.</li> <li>• Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible: <ul style="list-style-type: none"> <li>○ All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.</li> <li>○ Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP.</li> <li>○ Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.</li> <li>○ Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a</li> </ul> </li> </ul>	<p>resources are inadvertently found during Project construction activities including excavation and grading, the Project would be required to follow the regulatory measures as detailed in PRC Sections 5097.5 and 30244. Therefore, through compliance with existing State regulations related to paleontological resources, impacts to unknown paleontological resources that could be inadvertently discovered at the Project Site would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas.</p> <ul style="list-style-type: none"> <li>• Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance.</li> <li>• Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.</li> </ul>	
<p><b>CUL-2, 3:</b> Potential to cause a substantial adverse change in the 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.</p>	<p><b>MM-CUL-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to</li> </ul>	<p><b>Consistent.</b> As discussed in Section V.5, Cultural Resources, there are no structures or other potentially historic resources on the Project Site. According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS) and the Los Angeles Historic Resources Inventory, the Project Site is not identified on any historic resource lists or databases.<sup>8,9</sup> However, as discussed in Section V.18, Tribal Cultural Resources, based on a review of City Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site is within proximity of an area of known archaeological sites or archaeological survey areas.<sup>10</sup></p>

<sup>8</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: April 2019.

<sup>9</sup> City of Los Angeles, Office of Historic Resources, *Los Angeles Historic Resources Inventory*, website: <http://www.historicplacesla.org/map>, accessed: April 2019.

<sup>10</sup> City of Los Angeles, *Citywide General Plan Framework Final Environmental Impact Report*, certified August 2001, Figure CR-1, Prehistoric and

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>determine whether the project area has been previously surveyed and whether historic resources were identified.</p> <ul style="list-style-type: none"> <li>• Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project.</li> <li>• Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.</li> </ul> </li> </ul>	<p>Although the Project Site is located in a highly urbanized area of the City and has been subject to past disturbance, previously unknown archaeological 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. The Tribal Cultural Resources report (TCR Report) prepared for the Project determined that excavation for the basement level of the Project may encounter underlying alluvial sediments in which tribal cultural resources could occur. Because there is a potential for previously unknown cultural resources to be present in the Project area, mitigation measures MM TCR-1 through TCR-4 are required. The Project would also be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required mitigation and regulatory compliance would ensure any found deposits are treated in accordance with</p>

*Historic Archaeological Sites and Survey Areas in the City of Los Angeles.*

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource.</li> <li>• Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.</li> <li>• Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified.</li> <li>• Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.</li> <li>• If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property.</li> <li>• Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the</li> </ul>	<p>federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Thus, the Project incorporates by reference and is consistent with SCAG 2016-2040 RTP/SCS Mitigation Measure MM RTP/SCS-CUL-2(b). Compliance with regulatory requirements and with the Project-specific mitigation measure fulfils the RTP/SCS mitigation measure and goes beyond the scope of MM RTP/SCS-CUL-2(b).</p> <p><b>MM TCR-1</b> Tribal Cultural Resources Presence/Absence Testing. Prior to the commencement of Project ground disturbance, a qualified archaeologist shall devise and execute a plan to test portions of the Project site for the presence or absence of buried tribal cultural resources (Testing Plan). Testing methods shall be established in consultation with the Project applicant, Native American representative from the Gabrielino Tongva Indians of California Tribal Council, appropriate agencies, and Project engineers/architects. These methods may include hand</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated.</p> <ul style="list-style-type: none"> <li>• Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.</li> </ul>	<p>excavation and/or mechanical excavation. The testing may include the presence of a Native American representative from the Gabrielino Tongva Indians of California Tribal Council. The Testing Plan shall be prepared in compliance with applicable state and local regulations for tribal cultural resources and shall be submitted to the City of Los Angeles for review and approval no fewer than 15 days before ground-disturbing Project activities commence. The Testing Plan shall also include a description of a Worker Training Protocol and Program (described in MM TCR-2), methods for treatment of tribal cultural resources should they be discovered, a communications protocol, methods for reporting, and identification of a curation facility should artifacts be collected.</p> <p>In the event that potential tribal cultural resources are present, the resources shall be documented and their significance shall be evaluated through appropriate means, as determined by a qualified archaeologist. If the discovery</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		<p>proves significant under CEQA and resource avoidance is not possible, data recovery or other means of mitigation shall be conducted to reduce potential impacts to less than significant. The results of this evaluation and data recovery shall be documented in a technical report that shall be submitted to the City of Los Angeles in a reasonable time after the last day of archaeological fieldwork. If the expected time required to complete the report exceeds one year, a preliminary memo summarizing the findings shall be submitted 4 weeks after the last day of archaeological fieldwork. The memo shall summarize the activities undertaken, preliminary results, and the expected time for submittal.</p> <p>In the event that the results of testing are negative, no further fieldwork shall be required unless identified by the qualified archaeologist or representative from the Gabrielino Tongva Indians of California Tribal Council and supported by substantial evidence. Negative testing results shall be documented in a technical report</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		<p>that shall be submitted to the City of Los Angeles no more than 90 days after the last day of archaeological fieldwork.</p> <p>Additional work includes but is not limited to preparing and executing a Tribal Cultural Resources Monitoring Plan.</p> <p>All recommended measures shall be undertaken under the direction of a qualified archaeologist. A qualified archaeologist is defined as an archaeologist meeting the Secretary of the Interior (SOI) Professional Qualifications Standards (PQS) for archaeology.</p> <p><b>MM TCR-2</b> Worker Training. Prior to the commencement of Project ground disturbance, a qualified archaeologist shall present a Tribal Cultural Resources Worker Training Protocol and Program to Project construction personnel. The training may be presented at the pre-grade meeting, and it shall include detailed procedures for the identification and recovery of significant cultural resources. The archaeologist shall inform Project personnel about the types of resources that could be</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		<p>encountered and procedures to follow in the event of a discovery, as well as the potential penalties for failing to adhere to applicable laws and regulations.</p> <p>All recommended measures shall be undertaken under the direction of a qualified archaeologist. A qualified archaeologist is defined as an archaeologist meeting the SOI PQS for archaeology.</p> <p><b>MM TCR-3</b> Unanticipated Discovery of Tribal Cultural Resources. In the event potential tribal cultural resources are exposed during construction, work in the immediate vicinity of the find (within 25 feet [8 m]) shall stop until a qualified archaeologist can evaluate the significance of the find, in accordance with the Testing Plan. Construction activities may continue in other areas as directed by the qualified archaeologist. If the discovery proves significant under CEQA and resource avoidance is not feasible, data recovery shall be conducted to reduce potential impacts to less than significant. The results of the significance evaluation and data recovery that has been undertaken, shall be</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		<p>documented in a technical report that shall be submitted to the City of Los Angeles within 12 months of the last day of archaeological fieldwork. Recovered materials that are considered to be significant by the qualified archaeologist shall be curated at an appropriate facility that will ensure their long-term preservation and will allow access for interested scholars. All recommended measures shall be undertaken under the direction of a qualified archaeologist. A qualified archaeologist is defined as an archaeologist meeting the SOI PQS for archaeology.</p> <p><b>MM TCR-4</b> Unanticipated Discovery of Human Remains. In the event of the unanticipated discovery of human remains, work in the immediate vicinity of the find (within 25 feet [8 m]) shall stop and no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State of CHSC Section 7050.5 and PRC Section 5097.98. The County Coroner shall be notified of the find immediately. If the human remains are determined to be</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		Native American or “ancient,” the County Coroner shall notify the NAHC, which will designate and notify a Native American MLD. The MLD shall complete the inspection of the site within 48 hours of notification and make recommendations regarding the treatment and disposition of human remains and items associated with Native American burials.
<p><b>CUL-4:</b> Potential to disturb human remains, including those interred outside of formal cemeteries, including Native American Sacred Sites.</p>	<p><b>MM-CUL-4(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060 and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>	<p><b>Consistent.</b> As discussed in Section V.5, Cultural Resources, and V.18, Tribal Cultural Resources, 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.</p> <p>The Tribal Cultural Resources report (TCR Report) prepared for</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>has been informed and has determined that no investigation of the cause of death is required.</p> <ul style="list-style-type: none"> <li>• If any discovered remains are of Native American origin: <ul style="list-style-type: none"> <li>○ Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.</li> <li>○ If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: <ul style="list-style-type: none"> <li>▪ The Native American Heritage Commission is unable to identify a descendent;</li> <li>▪ The descendant identified fails to make a recommendation; or</li> <li>▪ The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.</li> </ul> </li> </ul> </li> </ul>	<p>the Project determined that excavation for the basement level of the Project may encounter underlying alluvial sediments in which tribal cultural resources could occur. Because there is a potential for previously unknown cultural resources to be present in the Project area, mitigation measures MM TCR-1 through TCR-4 are required.</p> <p>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 required mitigation and 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. Thus, the Project incorporates by reference and is consistent with SCAG 2016-2040 RTP/SCS Mitigation Measure MM RTP/SCS-CUL-2(b). Compliance with regulatory requirements and</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		with the Project-specific mitigation measure fulfils the RTP/SCS mitigation measure and goes beyond the scope of MM RTP/SCS-CUL-2(b).
<b>Energy</b>		
<p><b>EN-2, 3:</b> Potential to increase residential energy consumption use; potential to increase building energy consumption in anticipated development.</p>	<p><b>MM-EN-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including: <ul style="list-style-type: none"> <li>○ Use energy efficient materials in building design, construction, rehabilitation, and retrofit.</li> <li>○ Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.</li> <li>○ Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight.</li> <li>○ Incorporate passive environmental control systems that account for the characteristics of the natural environment.</li> <li>○ Use high-efficiency lighting and cooking devices.</li> <li>○ Incorporate passive solar design.</li> </ul> </li> </ul>	<p><b>Not Applicable/Consistent:</b> The Project would construct 98 residential units where currently no residential units exist. Therefore, the Project would result in an increase in energy consumption on the Project Site compared to existing conditions. However, the Project would be required to comply with 2016 Title 24 standards and applicable 2016 CALGreen requirements. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. Specifically, as required by current Title 24 and CALGreen standards, the Project would include installation of energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control systems, low-flow water-use fixtures, and energy-efficient</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Use high-reflectivity building materials and multiple glazing.</li> <li>○ Prohibit gas-powered landscape maintenance equipment.</li> <li>○ Install electric vehicle charging stations.</li> <li>○ Reduce wood burning stoves or fireplaces.</li> <li>○ Provide bike lanes accessibility and parking at residential developments.</li> </ul>	pumps and motors for waste and storm water conveyance, fire water, and domestic water. As such, the proposed residential units would be more energy efficient than older residential units. Compliance with existing regulations for new construction is required for the Project and therefore the Project would comply with the mitigation measure.
<b>Geology and Soils</b>		
<p><b>GEO-1, 3, 4:</b> Adverse effects due to earthquake or other seismic activity; unstable geologic unit or soil; expansive soil.</p>	<p><b>MM-GEO-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as</p>	<p><b>Not Applicable:</b> As discussed in Section V.7, Geology and Soils, the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone.<sup>11</sup> The nearest active fault is the Santa Monica Fault, approximately 6.2 miles north of the Project Site<sup>12</sup> and, thus, well over 50 feet away, which is the range within fault rupture generally occurs. Moreover, the Project Site is not within a Preliminary Fault Rupture Study Area.<sup>13</sup> Thus, the</p>

<sup>11</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: April 2019.

<sup>12</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: April 2019.

<sup>13</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: April 2019.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault.</li> <li>• Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC.</li> <li>• Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas.</li> <li>• Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard</li> </ul>	<p>potential for fault rupture at the Project Site would be low. Further, the Project would be required to comply with applicable state and local building and seismic codes and implement all site- and Project-specific design recommendations contained in the Geotechnical Investigation that was prepared for the Project and approved by the Los Angeles Department of Building and Safety. The Project is subject to regulatory compliance measures, which avoid and/or reduce the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>design, grading, and construction practices in order to avoid or reduce geologic hazards.</p> <ul style="list-style-type: none"> <li>• Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.</li> <li>• Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.</li> <li>• Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.</li> </ul>	
<p><b>GEO-2:</b> Potential to result in substantial soil erosion or the loss of topsoil.</p>	<p><b>MM-GEO-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City</p>	<p><b>Not Applicable.</b> As determined in Section V.7, Geology and Soils, during construction, Project grading and excavation would expose relatively low amounts of soil for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: <ul style="list-style-type: none"> <li>○ File a Notice of Intent (NOI) with the SWRCB.</li> <li>○ Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.</li> <li>○ Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB.</li> </ul> </li> </ul>	<p>excavation processes, substantial erosion is unlikely to occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in the required SWPPP, which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. As such, the Project would comply with the mitigation measure through compliance with existing regulatory compliance measures.</p> <p>The potential for soil erosion during operation of the Project is low due to the fact that the Project Site would be almost entirely paved and/or landscaped. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the proposed buildings and paving while the remaining portions of the Project Site would</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project.</p> <ul style="list-style-type: none"> <li>○ After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB.</li> <li>● 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.</li> <li>● 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.</li> </ul>	<p>be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project as pad and roof drainage would be collected and transferred to the street or approved location in non-erosive drainage devices as required by applicable regulations.</p>
<b>Greenhouse Gas Emissions and Climate Change</b>		
<p>Greenhouse Gas (GHG) Cumulative Impacts</p>	<p><b>MM-GHG-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set</p>	<p><b>Not Applicable:</b> As determined in Section V.8. Greenhouse Gas Emissions, the Project will result in approximately 995.88 MTCO<sub>2e</sub> per year; the Project would not exceed the SCAQMD/City's screening threshold of 3,000 MTCO<sub>2e</sub> per year. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change. The Project would also not conflict with the CARB Scoping Plan (2008 and 2017</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region as set forth below, or through comparable measures identified by Lead Agency:</p> <ul style="list-style-type: none"> <li>• Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision.</li> <li>• Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.</li> <li>• Off-site measures to mitigate a project's emissions.</li> <li>• 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: <ul style="list-style-type: none"> <li>○ Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction;</li> <li>○ Use alternative (non-petroleum based) fuels;</li> <li>○ Deployment of zero- and/or near zero emission technologies as defined by CARB;</li> <li>○ Use lighting systems that are energy efficient, such as LED technology;</li> <li>○ Use the minimum feasible amount of GHG-emitting construction materials that is feasible;</li> <li>○ Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production;</li> </ul> </li> </ul>	<p>Scoping Plans) or the City of Los Angeles Sustainable City pLAn, and would comply with the CALGreen Code and Los Angeles Green Building Code. Thus, no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse;</li> <li>○ Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy;</li> <li>○ Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption;</li> <li>○ Use lighter-colored pavement where feasible;</li> <li>○ Recycle construction debris to maximum extent feasible;</li> <li>○ Protect and plant shade trees in or near construction projects where feasible; and</li> <li>○ Solicit bids that include concepts listed above.</li> <li>● Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles.</li> <li>● Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network.</li> <li>● 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.</li> <li>● Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.</li> <li>● Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles.</li> <li>● Land use siting and design measures that reduce GHG emissions, including:</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Developing on infill and brownfields sites;</li> <li>○ Building high density and mixed use developments near transit;</li> <li>○ Retaining on-site mature trees and vegetation, and planting new canopy trees;</li> <li>○ 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</li> <li>○ Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.</li> </ul>	
<b>Hazards and Hazardous Materials</b>		
<p><b>HAZ-1, 2, 3:</b> Potential to create a significant hazard to the public or the environment through: routine transport, use, or disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or materials near school.</p>	<p><b>MM-HAZ-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>● Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of</li> </ul>	<p><b>Not Applicable/Consistent:</b> As determined in Section V.9. Hazards and Hazardous Materials, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in residential developments. A Preliminary Phase I Environmental Site Assessment (ESA) for the Project Site determined that recognized environmental conditions (RECs) were ascertained in connection with the site. Based on this historic data, additional site assessment research and subsurface activities were recommended for the subject</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>proposed routes of travel demonstrating use of roadways designated for the transport of such materials.</p> <ul style="list-style-type: none"> <li>• Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.</li> <li>• Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials.</li> <li>• Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project.</li> <li>• 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: <ul style="list-style-type: none"> <li>○ The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.</li> <li>○ The location of such hazardous materials.</li> <li>○ An emergency response plan including employee training information.</li> <li>○ A plan that describes the manner in which these materials are handled, transported and disposed.</li> </ul> </li> </ul>	<p>property. The Phase II ESA determined that elevated levels of hydrocarbons and lead are present on the Project Site within the area of artificial fill. As the potential exists for impacts related to the release of hazardous materials, the Project incorporates project-specific mitigation measures HAZ-1 and HAZ-2, as listed below. The Project incorporates by reference and is consistent with SCAG 2016-2040 RTP/SCS Mitigation Measures MM RTP/SCS HAZ-1(b) and MM RTP/SCS HAZ-4(b). However, the Project-specific mitigation measures fulfil the RTP/SCS mitigation measures and go beyond the scope of the RTP/SCS measures.</p> <p><b>MM HAZ-1.</b> The artificial fill prism present on the southeastern portion of the property (3311 Thatcher Avenue) shall be removed as required by the geotechnical engineer for foundation support and as required to mitigate the presence of lead in the fill prior to construction of the proposed buildings. After removal of the approximately 10 feet of fill</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects.</li> <li>• Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.</li> <li>• Avoid overtopping construction equipment fuel gas tanks.</li> <li>• During routine maintenance of construction equipment, properly contain and remove grease and oils.</li> <li>• Properly dispose of discarded containers of fuels and other chemicals.</li> </ul>	<p>deposit, a vent cone and membrane system shall be installed and approved by LADBS over the onsite abandoned oil core hole.</p> <p><b>MM HAZ-2.</b> A site remediation plan shall be developed to address potentially elevated concentrations of lead within the fill deposit at the Project Site. The plan shall address removal of the potentially impacted soil, characterization of the potentially impacted soil, and identification of appropriate disposal. The remediation plan shall also address removal of the on-site groundwater monitoring wells on the Project Site. This remediation plan shall be reviewed and approved by the RWQCB prior to implementation.</p>
<p><b>HAZ-4:</b> 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</p>	<p><b>MM-HAZ-4(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines; SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the</p>	<p><b>Consistent:</b> As discussed in Section V.9. Hazards and Hazardous Materials, a Phase II ESA determined that elevated levels of hydrocarbons and lead are present on the Project Site within the area of artificial fill. As the potential exists for impacts related to the release of hazardous materials, the Project</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
the public or the environment.	<p>Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Clean-up Act, and the Uniform Building Code, and County and City building standards, and all applicable federal, state, and local laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.</li> <li>• 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.</li> <li>• Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to</li> </ul>	<p>will implement mitigation measures HAZ-1 and HAZ-2, listed below. Compliance with those mitigation measures would be overseen by the Lead Agency and are subject to state and regional review and approval and potential impacts would be mitigated to a less than significant level. The Project incorporates by reference and is consistent with SCAG 2016-2040 RTP/SCS Mitigation Measures MM RTP/SCS HAZ-1(b) and MM RTP/SCS HAZ-4(b). However, the Project-specific mitigation measures fulfil the RTP/SCS mitigation measures and go beyond the scope of the RTP/SCS measures.</p> <p><b>MM HAZ-1.</b> The artificial fill prism present on the southeastern portion of the property (3311 Thatcher Avenue) shall be removed as required by the geotechnical engineer for foundation support and as required to mitigate the presence of lead in the fill prior to construction of the proposed buildings. After removal of the approximately 10 feet of fill deposit, a vent cone and</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.</li> <li>• 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.</li> <li>• Use best management practices (BMPs) regarding potential soil and groundwater hazards.</li> <li>• 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-</li> </ul>	<p>membrane system shall be installed and approved by LADBS over the onsite abandoned oil core hole.</p> <p><b>MM HAZ-2.</b> A site remediation plan shall be developed to address potentially elevated concentrations of lead within the fill deposit at the Project Site. The plan shall address removal of the potentially impacted soil, characterization of the potentially impacted soil, and identification of appropriate disposal. The remediation plan shall also address removal of the on-site groundwater monitoring wells on the Project Site. This remediation plan shall be reviewed and approved by the RWQCB prior to implementation.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>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.</p> <ul style="list-style-type: none"> <li>• Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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;</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations.</p> <ul style="list-style-type: none"> <li>• Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.</li> <li>• 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.</li> <li>• Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.</li> </ul>	
<b>HAZ-7:</b> Potential to impair implementation of or physically interfere	<b>MM-TRA-5(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency	<b>Not Applicable:</b> As discussed in Section V.9. Hazards and Hazardous Materials, there are

Impacts	Project-Level Mitigation Measures	Project Applicability
with an adopted emergency response plan or emergency evacuation plan.	<p>access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: <ul style="list-style-type: none"> <li>○ Identification of all roadway locations where special construction techniques (e.g., directional drilling or night</li> </ul> </li> </ul>	<p>no critical facilities or lifeline systems in the immediate vicinity of the Project Site.<sup>14</sup> None of the roadways that run adjacent to the Project Site (Thatcher Avenue, Princeton Drive, or Oxford Avenue) are identified as a disaster route by either the City,<sup>15</sup> or by Los Angeles County.<sup>16</sup> Lincoln Boulevard, approximately 1,000 feet east of the Project Site, is a County- and City-designated disaster route.<sup>17</sup> Nonetheless, as discussed under threshold question 17.a), below, the Project would not result in any significant traffic impacts. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LAFD</p>

<sup>14</sup> 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.*

<sup>15</sup> 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.*

<sup>16</sup> Los Angeles County Department of Public Works, *Disaster Route Maps, City of Culver City map, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019.*

<sup>17</sup> Los Angeles County Department of Public Works, *Disaster Route Maps, City of Culver City map, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019; 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.**

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>construction) would be used to minimize impacts to traffic flow.</p> <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ Scheduling of truck trips outside of peak morning and evening commute hours.</li> <li>○ Limiting of lane closures during peak hours to the extent possible.</li> <li>○ Usage of haul routes minimizing truck traffic on local roadways to the extent possible.</li> <li>○ Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.</li> <li>○ Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.</li> <li>○ Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.</li> <li>○ Storage of construction materials only in designated areas.</li> <li>○ Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.</li> </ul>	<p>during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways, including Lincoln Boulevard, would be impeded. Access for emergency service providers and any evacuation routes would be maintained during construction and operation. Therefore, impacts would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>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.</p> <ul style="list-style-type: none"> <li>• Enhance emergency preparedness awareness among public agencies and with the public at large. <ul style="list-style-type: none"> <li>○ Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following:</li> <li>○ Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities.</li> <li>○ Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.</li> <li>○ Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.</li> </ul> </li> </ul>	
<p><b>HAZ-8:</b> Potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where</p>	<p><b>MM-HAZ-8(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for</p>	<p><b>Not Applicable:</b> As discussed in Section V.9. Hazards and Hazardous Materials, the Project Site is not within a Very High Fire Hazard Severity Zone,<sup>18</sup> nor is the Project Site or surrounding area within a wildland fire hazard area.<sup>19</sup> The Project would not directly or indirectly expose</p>

<sup>18</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: June 15, 2018.

<sup>19</sup> City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.

Impacts	Project-Level Mitigation Measures	Project Applicability
residences are intermixed with wildlands.	<p>significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers.</li> <li>• Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, and public outreach.</li> <li>• Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, low growth habits, ignition-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat.</li> <li>• Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of non-native, invasive species to promote healthy, natural ecosystem regrowth. Native vegetation is more likely to have deep root systems that prevent slope failure and erosion of burned areas than shallow-rooted non-natives.</li> <li>• Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval.</li> </ul>	people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts related to wildland fires would be less than significant; no mitigation measures are required.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase.</p> <ul style="list-style-type: none"> <li>• Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat.</li> <li>• Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts.</li> <li>• Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.</li> </ul>	
<b>Hydrology and Water Quality</b>		
<p><b>HYD-1, 3, 4, 5, 6:</b> 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.</p>	<p><b>MM-HYD-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p>	<p><b>Not Applicable:</b> As discussed in Section V.10, Hydrology and Water Quality, 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</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.</li> <li>• Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.</li> <li>• 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.</li> <li>• Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.</li> <li>• Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.</li> <li>• 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: <ul style="list-style-type: none"> <li>○ U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act.</li> <li>○ Regional Water Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above.</li> <li>○ California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW.</li> </ul> </li> </ul>	<p>County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of BMPs, including, but not 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 comply with the mitigation measure through compliance with existing regulatory compliance measures, and impacts on water quality would be less than significant; no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.</li> <li>• 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.</li> <li>• Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies.</li> <li>• Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.</li> <li>• 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.</li> <li>• 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.</li> <li>• Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters.</p> <ul style="list-style-type: none"> <li>• Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel.</li> <li>• 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.</li> <li>• Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.</li> <li>• If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.</li> </ul>	
<p><b>HYD-2:</b> Potential to substantially deplete groundwater supplies or interfere substantially with groundwater</p>	<p><b>MM-HYD-2(b):</b> Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water</p>	<p><b>Not Applicable.</b> Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
<p>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).</p>	<p>Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms with federal, state, regional, and local standards for sustainable management of groundwater basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.</li> <li>• Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation.</li> <li>• Avoid designs that require continual dewatering where feasible.</li> <li>• Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.</li> </ul>	<p>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 interfere with any groundwater recharge activities within the area. The Project Site is currently entirely paved with an impermeable surface. Thus, the degree to which surface water infiltration and groundwater recharge currently occurs on-site is negligible. Under the Project, the amount of impermeable surface area would be increased comparatively.</p> <p>The historically highest groundwater level recorded is five feet above grade.<sup>20</sup> Because existing groundwater seepage was encountered as part of the Geotechnical Investigation at a depth of 18 feet, groundwater may be encountered during construction of the subterranean level and foundations. If</p>

<sup>20</sup> Feffer Geological Consulting, Inc., *Geotechnical Investigation, May 18, 2017.*

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</li> </ul>	<p>groundwater is encountered, dewatering may be required and would be designed by a dewatering contractor and engineer with approval by LADBS. Furthermore, there is no sustainable groundwater management plan governing the Project area.<sup>21</sup></p> <p>Therefore, 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. Therefore, impacts would be less than significant and no mitigation measures are required.</p>
<p><b>HYD-8:</b> 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.</p>	<p><b>MM-HYD-8(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and</p>	<p><b>Not Applicable.</b> According to the FEMA Flood Insurance Rate Map, the Project Site is within Zone X – Area of Minimal Flood Hazard, which is a designation for areas determined to be outside the 100-year flood hazard area.<sup>22</sup> Thus, the Project Site is not located within a designated</p>

<sup>21</sup> Los Angeles County Waterworks District, <https://dpw.lacounty.gov/wwd/web/About/SGMA.aspx>, accessed January 2019.

<sup>22</sup> Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1752F, effective September 26, 2008, website: <http://msc.fema.gov/portal>, accessed: April 2019.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program.</li> <li>• 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.</li> </ul>	<p>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.</p>
<b>Land Use and Planning</b>		
<p><b>LU-1:</b> Potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</p>	<p><b>MM-LU-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may</p>	<p><b>Not Applicable.</b> The Project does not require or request a variance or amendment from any adopted zoning or general plan. Zoning and the General Plan consistency are further discussed in Section V.11, Land Use and Planning. Specifically, the consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in Table V-10, Project Consistency with the Framework Element. Applicable</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>include the following, and/or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.</li> </ul>	<p>objectives and policies for residential development begin with Objective 3.1. As shown in Table V-10, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.</p>
<p><b>LU-2:</b> Potential to physically divide an established community.</p>	<p><b>MM-LU-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>Consider alignments within or adjacent to existing public rights-of-way.</li> <li>Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.</li> <li>Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for</li> </ul>	<p><b>Not Applicable.</b> As discussed in Section V.11, Land Use and Planning, the Project would not physically disrupt or divide the surrounding established community. The Project would involve the development of residential apartment units, on a site surrounded on three sides by residential development. The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing 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</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).</p> <ul style="list-style-type: none"> <li>• Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods.</li> <li>• 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: <ul style="list-style-type: none"> <li>○ Alignment shifts to minimize the area affected.</li> <li>○ Reduction of the proposed right-of-way take to minimize the overall area of impact.</li> <li>○ Provisions for bicycle, pedestrian, and vehicle access across improved roadways.</li> </ul> </li> <li>• Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project.</li> <li>• Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.</li> </ul>	<p>significant and no mitigation measures are required.</p>
<b>Mineral Resources</b>		
<p><b>MIN-1, 2:</b> Potential to result in the loss of availability of a known mineral resource; potential to result in the loss of availability of a</p>	<p><b>MM-MIN-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local</p>	<p><b>Not Applicable.</b> As discussed in Section V.12, Mineral Resources, the Project Site is not located within an MRZ-2 zone<sup>23</sup> nor within a major drilling area or State-designated oil field.<sup>24</sup> The</p>

<sup>23</sup> City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, adopted September 2001.

<sup>24</sup> City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996.

Impacts	Project-Level Mitigation Measures	Project Applicability
locally important mineral resource recovery site.	<p>general plan, specific plan or other land use plan that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with SMARA, California Department of Conservation regulations, local general plans, specific plans, and other laws and regulation governing mineral or aggregate resources, as applicable and feasible. Such measures may include the following, other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.</li> <li>• 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: <ul style="list-style-type: none"> <li>○ Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.</li> <li>○ 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.</li> <li>○ 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</li> </ul> </li> </ul>	Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Therefore, no impact would occur and no mitigation measures are required.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>completion of the improvement and during long-term operations.</p> <ul style="list-style-type: none"> <li>○ Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.</li> </ul>	
<b>Noise</b>		
<p><b>NOISE-1, 3, 4:</b> 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.</p>	<p><b>MM-NOISE-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor’s Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Install temporary noise barriers during construction.</li> <li>• Include permanent noise barriers and sound-attenuating features as part of the project design.</li> <li>• Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance. Where construction activities</li> </ul>	<p><b>Not Applicable.</b> As discussed in Section V.12, Noise, the Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project excess of standards established in the local general plan or noise ordinance. Construction noise levels are expected to range from 53.6 to 72.9 dBA Leq at the sensitive receiver locations. To control noise impacts associated with the construction of the proposed Project, the LAMC has established an exterior noise level standard of 75 dBA Leq. Based on the Project-related construction noise levels approaching 72.9 dBA Leq, the unmitigated noise levels satisfy the LAMC 75 dBA Leq exterior</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices.</p> <ul style="list-style-type: none"> <li>• Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels.</li> <li>• 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.</li> <li>• Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.</li> <li>• 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.</li> <li>• Designate an on-site construction complaint and enforcement manager for the project.</li> <li>• Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers,</li> </ul>	<p>noise level standard for construction. Therefore, Project construction noise levels represent a less than significant noise impact at adjacent sensitive receiver locations (see Table V-14 in Section V).</p> <p>During Project occupancy, the daytime operational noise levels of the Project are expected to range from 32.8 to 55.3 dBA; this is within the City of LAMC limits of 59.2 to 62.2 dBA (see Table V-15 in Section V). Impacts would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors.</li> <li>• Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.</li> <li>• Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible.</li> <li>• Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way.</li> <li>• Use noise barriers to protect sensitive receptors from excessive noise levels during construction.</li> <li>• Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls.</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.</li> <li>• Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.</li> <li>• 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.</li> </ul>	
<p><b>NOISE-2:</b> Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.</p>	<p><b>MM-NOISE-1(b).</b>  <b>MM-NOISE-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Federal Transportation Authority and Caltrans guidance documents, county or city transportation commission, noise and vibration ordinances and general plan noise elements for the counties and cities where projects are undertaken and other health and safety regulations set forth by federal state, and local authorities that regulate vibration levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p><b>Not Applicable.</b> As discussed in Section V.12, Noise, the Project would not expose persons to or generate excessive groundborne vibration or noise. Ground-borne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by the FTA. Construction activities that would have the potential to generate low levels of ground-borne vibration within the Project site include grading. Based on the reference vibration levels provided by the FTA, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec peak-particle-velocity (PPV) at 25 feet. At distances ranging from 29 to 81 feet from primary Project</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.</li> <li>• 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.</li> <li>• For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration.</li> </ul>	<p>construction activities, construction vibration velocity levels are expected to range from 0.015 to 0.071 in/sec PPV. Based on the Caltrans older residential building damage threshold of 0.3 in/sec PPV, the Project construction activities would result in vibration levels which are anticipated to remain below the threshold for building damage, and therefore, represents a less than significant impact.</p> <p>Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways. During Project operation, the proposed residential land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		<p>operation of the Project would be less than significant.</p> <p>Impacts would be less than significant and no mitigation measures are required.</p>
<b>Population, Housing, and Employment</b>		
<p><b>PHE-1:</b> 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).</p>	<p><b>MM-LU-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.</li> </ul>	<p><b>Not Applicable.</b> As discussed in Section V.14, Population and Housing, the Project would could generate approximately 238 residents (98 residential x 2.43 persons per unit). According to SCAG data, the City of Los Angeles subregion had a total population of 4,059,665 persons in 2018. Extrapolations of 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. The addition of the new residents housed by the Project would be within the SCAG growth projection, representing approximately 0.06 percent of the Citywide total growth for the period of 2018 to 2035, and approximately 0.04 percent of the Citywide total growth for the period of 2018 to 2040. This increase would not be</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		<p>considered a substantial increase for the area and is within the anticipated SCAG forecast for population.</p> <p>With respect to housing, the Project would introduce 98 affordable residential units to the area: 68 designated for seniors, and 30 for families. 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 98 housing units proposed would be within the growth anticipated based on SCAG projections, representing approximately 0.07 percent of the Citywide total housing growth for the period of 2018 to 2035, and approximately 0.04 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 98 new affordable senior and family residential units is within the anticipated housing increases</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
		<p>based on SCAG projections for housing.</p> <p>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.</p> <p>As such, the Project would not induce substantial population growth, either directly or indirectly and impacts would be less than significant; no mitigation measures are required.</p>
<p><b>PHE-2, 3:</b> Potential to displace substantial amount of existing housing; potential to displace substantial number of people</p>	<p><b>MM-PHE-2(b).</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction's housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p><b>Not Applicable.</b> The Project would not displace existing housing, as no residences currently exist on the Project Site. Therefore, no impacts would occur and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Prioritize the use existing ROWs, wherever feasible.</li> <li>• Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.</li> </ul>	
<b>Public Services</b>		
<p><b>PS-1:</b> 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.</p>	<p><b>Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b).</b></p> <p><b>MM-PS-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide sufficient structures and buildings to accommodate fire and emergency response, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> <li>• Where the project has the potential to generate the need for expanded emergency response services which exceed the</li> </ul>	<p><b>Not Applicable.</b> As discussed in Section V.15, Public Services, the fire station with the nearest engine company is Fire Station No. 62, located at 11970 W Venice Boulevard, approximately 2.3 roadway miles to the northeast from the Project Site.<sup>25</sup> Because the Project Site is not within the 2-mile response distance standard of a station with a truck engine, the Project is required to install automatic fire sprinkler systems. LAMC Section 57.507.3.3 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 proposed 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</p>

<sup>25</sup> City of Los Angeles Fire Department, Fire Station Directory, March 2014.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements.</p> <ul style="list-style-type: none"> <li>• During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.</li> </ul>	<p>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 impacts.</p> <p>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 fire protection. Impacts related to fire protection would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
<p><b>PS-2:</b> 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.</p>	<p><b>Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b).</b></p> <p><b>MM-PS-2(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including:</p> <ul style="list-style-type: none"> <li>• Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description.</li> </ul>	<p><b>Not Applicable.</b> As discussed in Section V.15, Public Services, 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. As required by City regulations, the Project would implement principles of the City's <i>Crime Prevention through Environmental Design Guidelines</i> subject to the approval of LAPD prior to the issuance of building permits.<sup>26</sup> The building and layout design of the Project would also include nighttime security lighting and secure parking facilities. 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</p>

<sup>26</sup> City of Los Angeles Police Department, Crime Prevention Section, *Design Out Crime Guidelines: Crime Prevention through Environmental Design*, November 1997.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.</li> <li>During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.</li> </ul>	<p>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.</p>
<p><b>PS-3:</b> 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</p>	<p><b>Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b).</b></p> <p><b>MM-PS-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response</p>	<p><b>Not Applicable.</b> 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. For the Project, the affordable senior</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
<p>environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools services.</p>	<p>times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> <li>• Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.</li> <li>• During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.</li> </ul>	<p>units would receive a full waiver for school fees; the affordable family units would get a partial waiver of school fees. 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.</p>
<b>Recreation</b>		
<p><b>REC-1, 2:</b> Increase use or physical deterioration of recreational facilities.</p>	<p><b>MM-REC-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on</p>	<p><b>Not Applicable.</b> In adopting Ordinance 184505 (the most recent amendments to LAMC</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures capable of avoiding or reducing significant impacts on the use of existing neighborhood and regional parks or other recreational facilities to ensure compliance with county and city general plans and the Quimby Act, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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: <ul style="list-style-type: none"> <li>○ Increasing the accessibility to natural areas for outdoor recreation.</li> <li>○ Promoting infill development and redevelopment to revitalize existing communities.</li> <li>○ Utilizing “green” development techniques.</li> <li>○ Promoting water-efficient land use and development.</li> <li>○ Encouraging multiple uses.</li> <li>○ Including trail systems and trail segments in General Plan recreation standards.</li> </ul> </li> </ul>	<p>12.33 C), the City determined to exempt affordable housing from park fees as a matter of policy. Therefore, impacts would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQTAs.</li> <li>• Where construction or expansion of recreational facilities is included in the project or required to meet public park service ratios, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-2(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.</li> </ul>	
<b>Transportation, Traffic, and Safety</b>		
<p><b>TRA-1:</b> 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</p>	<p><b>MM-TRA-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation</p>	<p><b>Not Applicable.</b> As demonstrated in Section V.17, Transportation, traffic impacts in the associated with the Project will be less than significant for the four study intersections with application of the City's thresholds. The Project's trips, 21 net new AM peak hour trips, and 19 net new PM peak hour trips</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
<p>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.</p>	<p>measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.</li> <li>• Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.</li> <li>• Provide a vanpool for employees.</li> <li>• Fund capital improvement projects to accommodate future traffic demand in the area.</li> <li>• Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: <ul style="list-style-type: none"> <li>○ Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement</li> <li>○ Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document)</li> <li>○ Signage and striping onsite to encourage bike safety</li> <li>○ Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials</li> <li>○ Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan.</li> <li>○ Direct transit sales or subsidized transit passes</li> <li>○ Guaranteed ride home program</li> <li>○ Pre-tax commuter benefits (checks)</li> </ul> </li> </ul>	<p>during a typical weekday, are fewer than 150 in either peak hour, and therefore the threshold of significance for a freeway mainline analysis is not met. 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.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ On-site car-sharing program (such as City Car Share, Zip Car, etc.)</li> <li>○ On-site carpooling program</li> <li>○ Distribution of information concerning alternative transportation options</li> <li>○ Parking spaces sold/leased separately</li> <li>○ Parking management strategies; including attendant/valet parking and shared parking spaces.</li> <li>● Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas.</li> <li>● Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible.</li> <li>● Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services.</li> <li>● Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work.</li> <li>● Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs.</li> <li>● Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions.</li> <li>• Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles.</li> <li>• Purchase, or create incentives for purchasing, low or zero-emission vehicles.</li> <li>• Create local “light vehicle” networks, such as neighborhood electric vehicle systems.</li> <li>• Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.</li> <li>• Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.</li> <li>• Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives.</li> <li>• Project Selection: <ul style="list-style-type: none"> <li>○ Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability.</li> <li>○ Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints.</li> </ul> </li> <li>○ Public Involvement: <ul style="list-style-type: none"> <li>○ Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members</li> </ul> </li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>and other stakeholders, especially to those traditionally underserved by transportation services.</p> <ul style="list-style-type: none"> <li>○ Transit and Multimodal Impact Fees: <ul style="list-style-type: none"> <li>○ Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations.</li> <li>○ Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions.</li> </ul> </li> <li>● System Monitoring: <ul style="list-style-type: none"> <li>○ Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency.</li> </ul> </li> <li>● Arterial Traffic Management: <ul style="list-style-type: none"> <li>○ Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary.</li> </ul> </li> <li>● Signal Synchronization: <ul style="list-style-type: none"> <li>○ Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic.</li> </ul> </li> <li>● HOV Lanes: <ul style="list-style-type: none"> <li>○ Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions.</li> </ul> </li> <li>● Delivery Schedules: <ul style="list-style-type: none"> <li>○ Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas.</li> <li>○ Implement and supporting trip reduction programs.</li> </ul> </li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives.</li> <li>● Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities</li> <li>● Bicycle and Pedestrian Trails: <ul style="list-style-type: none"> <li>○ Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations.</li> </ul> </li> <li>● Bicycle Safety Program: <ul style="list-style-type: none"> <li>○ Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers.</li> </ul> </li> <li>● Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects.</li> <li>● Bicycle Parking: <ul style="list-style-type: none"> <li>○ Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists).</li> </ul> </li> <li>● Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation;</li> <li>○ Eliminate or reduce minimum parking requirements for new buildings;</li> <li>○ “Unbundle” parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space);</li> <li>○ Use parking pricing to discourage private vehicle use, especially at peak times;</li> <li>○ Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities;</li> <li>○ Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times;</li> <li>○ Encourage shared parking programs in mixed-use and transit-oriented development areas.</li> <li>● Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: <ul style="list-style-type: none"> <li>○ Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking;</li> <li>○ Encourage special event center operators to advertise and offer discounted transit passes with event tickets;</li> <li>○ Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking;</li> <li>○ Promote the use of bicycles by providing space for the operation of valet bicycle parking service.</li> </ul> </li> <li>● Parking “Cash-out” Program:</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Require new office developments with more than 50 employees to offer a Parking “Cash-out” Program to discourage private vehicle use.</li> <li>● Pedestrian and Bicycle Promotion: <ul style="list-style-type: none"> <li>○ Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.</li> </ul> </li> <li>● Fleet Replacement: <ul style="list-style-type: none"> <li>○ Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.</li> </ul> </li> </ul>	
<p><b>TRA-2:</b> Potential to conflict with an applicable congestion management program, including, but not limited to, VMT and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways.</p>	<p><b>MM-TRA-2(b).</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions:</p> <ul style="list-style-type: none"> <li>● Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute</li> </ul>	<p><b>Not Applicable.</b> As demonstrated in Section V.17, Transportation, the Project’s trips, 21 net new AM peak hour trips, and 19 net new PM peak hour trips during a typical weekday, are fewer than 150 in either peak hour, and therefore the threshold of significance for a freeway mainline analysis per the Congestion Management Plan is not met. Therefore, impacts would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation:</p> <ul style="list-style-type: none"> <li>○ Advocate for a regional, market-based system to price or charge for auto trips during peak hours.</li> <li>○ Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.</li> <li>○ Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology.</li> <li>○ Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation.</li> <li>○ Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay.</li> <li>● Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>items and requirements, if determined feasible and applicable by the Lead Agency:</p> <ul style="list-style-type: none"> <li>○ A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes.</li> <li>○ Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.</li> <li>○ Location of construction staging areas for materials, equipment, and vehicles at an approved location.</li> <li>○ A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit.</li> <li>○ Provision for accommodation of pedestrian flow.</li> <li>○ As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces.</li> <li>○ Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense., within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency)</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy.</p> <ul style="list-style-type: none"> <li>○ Any heavy equipment brought to the construction site shall be transported by truck, where feasible.</li> <li>○ No materials or equipment shall be stored on the traveled roadway at any time.</li> <li>○ Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion.</li> <li>○ All equipment shall be equipped with mufflers.</li> <li>○ Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors.</li> <li>○ Promote “least polluting” ways to connect people and goods to their destinations.</li> <li>● Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency: <ul style="list-style-type: none"> <li>○ Ensure transportation centers are multi-modal to allow transportation modes to intersect.</li> <li>○ Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail.</li> <li>○ To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges.</li> </ul> </li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations.</li> <li>○ Coordinate schedules and routes across service lines with neighboring transit authorities.</li> <li>○ Support programs to provide “station cars” for short trips to and from transit nodes (e.g., neighborhood electric vehicles).</li> <li>○ Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so.</li> <li>○ Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles.</li> <li>○ Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets.</li> <li>○ Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible.</li> <li>● Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> <li>○ Ensure transit stops and bus lanes are safe, convenient, clean and efficient.</li> <li>○ Ensure transit stops have clearly marked street-level designation, and are accessible.</li> <li>○ Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate.</li> </ul> </li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one-half mile.</li> <li>● Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> <li>○ Develop a Regional Pass system to reduce the number of different passes and tickets required of system users.</li> <li>○ Implement “Smart Bus” technology, using GPS and electronic displays at transit stops to provide customers with “real-time” arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service).</li> <li>○ Investigate the feasibility of an on-line trip-planning program.</li> </ul> </li> <li>● Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> <li>○ Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic.</li> <li>○ Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.</li> </ul> </li> <li>● Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> <li>○ Designate a certain percentage of parking spaces for ride-sharing vehicles.</li> </ul> </li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles.</li> <li>○ Provide a web site or message board for coordinating shared rides.</li> <li>○ Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit.</li> <li>○ Hire or designate a rideshare coordinator to develop and implement ridesharing programs.</li> <li>● Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> <li>○ Provide assistance to regional and local ridesharing organizations.</li> <li>○ Advocate for legislation to maintain and expand incentives for employer ridesharing programs.</li> <li>○ Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes.</li> <li>○ Provide public recognition of effective programs through awards, top ten lists, and other mechanisms.</li> </ul> </li> <li>● Implement a “guaranteed ride home” program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program.</li> <li>● Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations.</li> <li>● Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers.</li> <li>● Work with existing shuttle service providers to coordinate their services.</li> <li>● Facilitate employment opportunities that minimize the need for private vehicle trips, including:</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations.</li> <li>○ Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.</li> <li>● Enforce state idling laws for commercial vehicles, including delivery and construction vehicles.</li> <li>● Organize events and workshops to promote GHG-reducing activities.</li> <li>● Implement a Parking Management Program to discourage private vehicle use, including: <ul style="list-style-type: none"> <li>○ Encouraging carpools and vanpools with preferential parking and a reduced parking fee.</li> <li>○ Institute a parking cash-out program.</li> <li>○ Renegotiate employee contracts, where possible, to eliminate parking subsidies.</li> <li>○ Install on-street parking meters with fee structures designed to discourage private vehicle use.</li> <li>○ Establish a parking fee for all single-occupant vehicles.</li> </ul> </li> <li>● Work with school districts to improve pedestrian and bicycle to schools and restore school bus service</li> <li>● Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities.</li> <li>● Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency.</li> <li>● Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers.</li> <li>● Synchronize traffic signals to reduce congestion and air quality.</li> </ul>	

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>• Work with community groups and business associations to organize and publicize walking tours and bicycle events.</li> <li>• Support legislative efforts to increase funding for local street repair.</li> </ul>	
<p><b>TRA-5:</b> Potential to result in inadequate emergency access.</p>	<p><b>MM-TRA-5(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>	<p><b>Not Applicable:</b> As discussed in Sections V.9. Hazards and Hazardous Materials, and V.17, Transportation, there are no critical facilities or lifeline systems in the immediate vicinity of the Project Site.<sup>27</sup> None of the roadways that run adjacent to the Project Site (Thatcher Avenue, Princeton Drive, or Oxford Avenue) are identified as a disaster route by either the City,<sup>28</sup> or by Los Angeles County.<sup>29</sup> Lincoln Boulevard, approximately 1,000 feet east of the Project Site, is a County- and City-designated disaster route.<sup>30</sup> Nonetheless, as discussed under threshold question 17.a), below, the Project would not result in</p>

<sup>27</sup> 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.*

<sup>28</sup> 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.*

<sup>29</sup> Los Angeles County Department of Public Works, *Disaster Route Maps, City of Culver City map, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019.*

<sup>30</sup> Los Angeles County Department of Public Works, *Disaster Route Maps, City of Culver City map, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019; 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.**

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:</p> <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ 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.</li> <li>○ Scheduling of truck trips outside of peak morning and evening commute hours.</li> <li>○ Limiting of lane closures during peak hours to the extent possible.</li> <li>○ Usage of haul routes minimizing truck traffic on local roadways to the extent possible.</li> <li>○ Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.</li> <li>○ Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.</li> <li>○ Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and</li> </ul>	<p>any significant traffic impacts. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LAFD during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways, including Lincoln Boulevard, would be impeded. Access for emergency service providers and any evacuation routes would be maintained during construction and operation. Therefore, impacts related to emergency access would be less than significant and no mitigation measures are required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>duration of construction activities and the locations of detours and lane closures.</p> <ul style="list-style-type: none"> <li>○ Storage of construction materials only in designated areas.</li> <li>○ Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.</li> <li>● 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.</li> <li>● Enhance emergency preparedness awareness among public agencies and with the public at large.</li> <li>● Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: <ul style="list-style-type: none"> <li>○ Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities.</li> <li>○ Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.</li> <li>○ Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.</li> </ul> </li> </ul>	
<b>Utilities and Service Systems</b>		
<b>USS-3:</b> Require or result in construction of new storm water drainage facilities or expansion of	<b>MM-USS-3(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on utilities and service systems, particularly for construction of	<b>Not Applicable.</b> As discussed in Sections V.10, Hydrology and Water Quality, and V.19, Utilities and Service Systems, the

Impacts	Project-Level Mitigation Measures	Project Applicability
<p>existing facilities, the construction of which could cause significant environmental effects.</p>	<p>stormwater drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8, and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan. Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant impacts on the use of existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities.</p> <p>See <b>MM-HYD-5(b)</b>.</p>	<p>Project's BMPs would be required to control stormwater runoff with no 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. 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.</p>
<p><b>USS-4:</b> Have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements.</p>	<p><b>MM-USS-4(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter –Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and</p>	<p><b>Not Applicable.</b> As discussed in Section V.19, Utilities and Service Systems, the Project would consume approximately 14,424 gpd (16 af/y) of water. This amount would represent approximately 0.001 percent of the water supply in 2040 in average, single-dry, and multiple-dry years. Compliance with LAMC Sections 122.00 - 122.10</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>applicable County, City or other Local provisions. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.</li> <li>• Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.</li> <li>• Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.</li> <li>• Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.</li> <li>• Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</li> <li>• Avoid designs that require continual dewatering where feasible.</li> </ul>	<p>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 development during normal, dry, and multiple dry years. Accordingly, impacts would be less than significant and no mitigation measures would be required.</p>

Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.</li> </ul>	
<p><b>USS-6:</b> Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.</p>	<p><b>MM-USS-6(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: <ul style="list-style-type: none"> <li>Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>Inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2)</li> </ul> </li> </ul>	<p><b>Not Applicable.</b> As discussed in Section V.19, Utilities and Service Systems, demolition of the Project Site's existing paving would generate approximately 2,088 tons of demolition waste<sup>31</sup> and construction of the Project buildings is estimated to generate a total of approximately 209 tons of solid waste.<sup>32</sup> As required by City Ordinance No. 181519, the construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. Moreover, the <i>Countywide Integrated Management Plan 2017 Annual Report</i> concludes that there is current capacity of 55.71 million tons available throughout the County for the disposal of inert waste.<sup>33</sup> Therefore, the Project-</p>

<sup>31</sup> 2,400 square feet of asphalt multiplied by 12 inches assumed depth is 28,800 cubic feet or 1,067 cubic yards. Asphalt is estimated to be 3,915 pounds per cubic yard, multiplied by 1,067 is 4,177,305 pounds (2,088 tons).

<sup>32</sup> A construction waste generation rate of 4.98 pounds per square foot for residential construction was used. 95,382 square feet of residential construction multiplied by 4.39 pounds is 418,727 pounds (209 tons). Source: USEPA Report No. EPA A530-98-010, *Characterization of building Related Construction and Debris in the United States, July 1998*.

<sup>33</sup> County of Los Angeles Department of Public Works, *Countywide Integrated Management Plan 2017 Annual Report, April 2019, Appendix E-2, Table 1*.

Impacts	Project-Level Mitigation Measures	Project Applicability
	<p>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.).</p> <ul style="list-style-type: none"> <li>○ Reuse of existing structure and shell in renovation projects.</li> <li>○ Design for deconstruction without compromising safety.</li> <li>○ Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components.</li> <li>○ Development of indoor recycling program and space.</li> <li>○ Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.</li> <li>○ Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required.</li> <li>○ Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target.</li> </ul>	<p>generated demolition debris of 2,088 tons and construction waste of 209 tons would represent a very small percentage of the inert waste disposal capacity in the region. During Project operation, it is conservatively assumed that all 1,199 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 7,582 tons and the permitted daily intake is 12,100 tons per day.<sup>34</sup> According to the <i>2014 Annual Report</i>, the Sunshine Canyon Landfill had approximately 64.7 million tons of remaining capacity.<sup>35</sup> As such, the landfill's permitted daily intake of 12,100 tons per day would accommodate the net daily operational waste generated by the Project of 1,199 pounds per day. The Project would be required to comply with CalGreen and with AB 939 requirements, requiring that 50 percent of the</p>

<sup>34</sup> California Integrated Waste Management Board, *Solid Waste Information System, Facility/Site Summary Details*, website: <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-2000>, accessed June 2019.

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Impacts	Project-Level Mitigation Measures	Project Applicability
	<ul style="list-style-type: none"> <li>○ 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.</li> <li>○ 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.</li> <li>○ Develop alternative waste management strategies such as composting, recycling, and conversion technologies.</li> <li>○ Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.</li> <li>○ Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).</li> <li>○ Integrate reuse and recycling into residential industrial, institutional and commercial projects.</li> <li>○ Provide recycling opportunities for residents, the public, and tenant businesses.</li> <li>○ Provide education and publicity about reducing waste and available recycling services.</li> <li>○ Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates.</li> <li>○ Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types.</li> </ul>	<p>Project's waste would be diverted for reuse or recycling.</p> <p>As such, the Project would comply with the mitigation measure through compliance with existing regulatory requirements.</p> <p>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.</p>