

APPENDIX A PSH ORDINANCE CONSISTENCY WITH 2016 RTP/SCS PROJECT LEVEL MITIGATION MEASURES		
Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to PSH Ordinance
Aesthetics		
Scenic Vistas	<p>MM-AES-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to “break up” large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that clear-cutting is not evident. • 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. • 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. 	<p>Measures not relevant. Qualified PSH Projects would be in urbanized areas in close proximity to transit where development is expected and encouraged. Qualified PSH projects would be residential and located in High Quality Transit Areas (HQTAs). Many are anticipated to be in Transit Priority Areas (TPAs). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.</p>
Visual Character	<p>MM-AES-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency.</p> <ul style="list-style-type: none"> • Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. 	<p>Measures not relevant. Qualified PSH Projects would be in urbanized areas in close proximity to transit where development is expected and encouraged. Qualified PSH projects would be residential and located in High Quality Transit Areas (HQTAs). Many are anticipated to be in Transit Priority Areas (TPAs). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.</p>

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	<ul style="list-style-type: none"> Design projects consistent with design guidelines of applicable general plans. Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. 	
Light, glare, shade.	<p>MM-AES-4(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 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"> Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations. Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. Use unidirectional lighting to avoid light trespass onto adjacent properties. Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. Provide structural and/or vegetative screening from light-sensitive uses. Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. 	Measures not relevant. PSH projects would be in urbanized areas in close proximity to transit where development is expected and encouraged. Qualified PSH projects would be residential and located in High Quality Transit Areas (HQTAs); many of them are expected to be in transit Priority Areas (TPAs). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.
Agricultural and Forest Resources		
Conversion of farmland to non-ag uses. Conversion of forest land.	<p>MM-AF-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into account project and site-specific considerations as applicable and feasible:</p>	Measure not relevant because agricultural and forest land do not exist in urban infill areas where PSH projects are anticipated to be developed.

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	<ul style="list-style-type: none"> For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act). Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. Maintain and expand agricultural land protections such as urban growth boundaries. <p>Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve 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 https://www.wildlife.ca.gov/Conservation/Planning/Banking)</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. A privately owned conservation or mitigation bank is a free-market enterprise that:</p> <ul style="list-style-type: none"> Offers landowners economic incentives to protect natural resources; Saves permittees time and money by providing them with the certainty of pre-approved compensation lands; Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values; Provides for long-term protection and management of habitat. A publicly owned conservation or mitigation bank: Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance.” In 2013, the University of California published an article entitled “Reforms could boost conservation banking by landowners” that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs. Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. Include underpasses and overpasses at reasonable intervals to maintain property access. Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible. Contact the California Department of Conservation and each county’s Agricultural Commissioner’s office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts. 	
Zoning for Ag use, Williamson	MM-AF-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from conflict with existing zoning for agricultural use	Measure not relevant because agricultural and forest land do not exist in urban infill areas where PSH projects are anticipated to

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Act Contract.	<p>or a Williamson Act contract that are within the jurisdiction and responsibility of the California Department of Conservation, other public agencies, and Lead Agencies. Where the Lead Agency has identified that a project has potential for significant effects, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of agriculture and forestry resources to ensure compliance with the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the California Land Conservation Act of 1965, the Farmland Security Zone Act, and county and city zoning codes, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> • Project relocation or corridor realignment to avoid lands in Williamson Act contracts. • Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. • Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable. 	be developed.
Air Quality		
Violation of air quality standards.	<p>MM-AIR-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable 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"> • Minimize land disturbance. • Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. • Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. • Cover trucks when hauling dirt. • Stabilize the surface of dirt piles if not removed immediately. • Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. • Minimize unnecessary vehicular and machinery activities. • Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. • On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. • Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. 	<p>The following regulatory control measures would address this measure; no additional measures required:</p> <p>RCM AIR-1: Demolition, grading and construction activities must comply with provisions of the SCAQMD District Rule 403, including the following:</p> <ul style="list-style-type: none"> • All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. • The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. • All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. • All dirt/soil loads shall be secured by trimming, watering or other

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	<ul style="list-style-type: none"> • Ensure that all construction equipment is properly tuned and maintained. • 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. • Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators. • Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. • As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. • Implement EPA's National Clean Diesel Program. • Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible. • On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity. • If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines. • Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines • Convert part of the construction truck fleet to natural gas. • Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts • Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road) • Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas • Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation • Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation • Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary • 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. 	<p>appropriate means to prevent spillage and dust.</p> <ul style="list-style-type: none"> • All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. • General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. • Trucks having no current hauling activity shall not idle but be turned off. <p>RCM AIR-2: PSH projects are required to comply with South Coast Air Quality Management District Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).</p> <p>RCM AIR-3: PSH projects are required to comply with Sections 2485 in Title 13 of the California Code of Regulations, which requires that idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.</p> <p>RCM AIR-4: PSH projects are required to comply with Section 93115 in Title 17 of the California Code of Regulations, that requires operation of any stationary, diesel-fueled, compression-ignition engines meet specified fuel and fuel additive requirements and emission standards.</p> <p>RCM AIR-5: PSH projects are required to comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.</p> <p>RCM AIR-6: PSH projects are required, as may be needed, to install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.</p>

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	<ul style="list-style-type: none"> Prohibit diesel idling within 1,000 feet of sensitive receptors. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. The engine size of construction equipment shall be the minimum practical size. Catalytic converters shall be installed on gasoline-powered equipment. Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit. Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite. Use new or rebuilt equipment. Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be checked by an ASE-certified mechanic and determined to be running in proper condition before it is operated. Use low rolling resistance tires on long haul class 8 tractor-trailers. Suspend all construction activities that generate air pollutant emissions during air alerts. Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines. 	
Sensitive receptors.	<p>MM-AIR-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects 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"> Set technology forcing new engine standards Reduce emissions from the in-use fleet Require clean fuels, and reduce petroleum dependency Work with US EPA to reduce emissions from federal and state sources Pursue long-term advanced technology measures. 	This Mitigation Measure is not relevant to the PSH Ordinance, as the PSH Ordinance does not involve a 2016-2040 RTP/SCS transportation project. The PSH ordinance does not establish new regulatory standards or requirements for vehicles, such as setting new engine standards or making improvements and enhancements to California's Smog Check Program.
Biological Resources		
Candidate, sensitive, or special status species. Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or	<p>MM-BIO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Sections 7, 9, and 10(a) of the federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, as applicable and feasible. Additional compliance should adhere to applicable implementing regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California Department of Fish and Wildlife.</p>	<p>This Mitigation Measure is not relevant to the PSH Ordinance as PSH sites are anticipated to be infill in urban areas in close proximity to transit and therefore PSH sites are not anticipated to contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p> <p>PSH projects would be required to comply with the Migratory Bird Treaty Act of 1918</p>

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ordinances protection biological resources. HCP, NCCP or other conservation plans.	<p>Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible Where avoidance is determined to be infeasible, 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 of 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. Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. Appoint an Environmental Inspector to monitor implementation of mitigation measures. Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance. Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. 	<p>(MBTA). Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds if present.</p> <p>RCM BIO-1: The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities.</p> <p>PSH projects would be required to comply with the City's Tree Protection Ordinance.</p> <p>RCM BIO-2: Los Angeles Municipal Code (LAMC) Sec. 46 Tree Preservation Ordinance (Ordinance No. 177,404) applies to protected trees (4 inches and greater in diameter) that are located on public and private properties. Protected tree removal requires a removal permit by the City of Los Angeles Department of Public Works (LADPW). Any act that may cause the failure or death of a protected tree requires inspection by the LADPW's Urban Forestry Division. The following tree species are protected: all native Oak tree species (<i>Quercus</i> spp), Western or California Sycamore (<i>Platanus racemosa</i>), California Bay (<i>Umbellularia californica</i>), Southern California Black Walnut (<i>Juglans californica</i>).</p>
Riparian or other sensitive natural community.	MM-BIO-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on state-designated sensitive habitats, including riparian habitats, that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department	This Mitigation Measure is not relevant to the PSH Ordinance as PSH sites are anticipated to be infill in urban areas in close proximity to transit and therefore would not contain riparian areas, wetlands

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Wetlands. Species movement. Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	<p>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> <ul style="list-style-type: none"> • 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. • Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino • Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully-Protected Species afforded protection pursuant to the State Fish and Game Code. • Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds. • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season. • Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities. • Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate. • Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. • Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats. • Install fencing and/or mark sensitive habitat to be avoided during construction activities. • Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area. • Revegetate with appropriate native vegetation following the completion of construction activities. 	or be expected to affect species movement or conservation plans. PSH projects would be required to comply with the City's Tree Protection Ordinance (see RCM BIO-2 above).

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	<ul style="list-style-type: none"> Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport. 	
Wetlands Species movement. Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	<p>MM-BIO-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant 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"> Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB). Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. 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. 	This Mitigation Measure is not relevant to the PSH Ordinance as PSH sites are anticipated to be infill in urban areas in close proximity to transit and therefore would not affect species movement or, policies, or regulations protecting biological resources. PSH projects would be required to comply with the City's Tree Protection Ordinance (see RCM BIO-2 above).
Species movement. Local policies or ordinances protecting biological resources. HCP, NCCP or other conservation	<p>MM-BIO-4(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and policies of counties and cities, as applicable and feasible.</p>	This Mitigation Measure is not relevant to the PSH Ordinance as PSH sites are anticipated to be infill in urban areas in close proximity to transit and therefore would not affect species movement. PSH projects would be required to comply with the City's Tree Protection Ordinance (see RCM BIO-2 above).

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plans.	<ul style="list-style-type: none"> Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur. Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement. Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible. Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31. Prohibit construction activities within 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and 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. Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible. Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern. 	

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	<ul style="list-style-type: none"> • Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. • Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas. • Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. • Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. • Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species. • Establish native vegetation within habitat pockets or the “wildling of urbanized habitats” that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas. 	
Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	<p>MM-BIO-5(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 comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible.</p> <ul style="list-style-type: none"> • Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. • Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist. • If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species. • Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. • Where proposed development or other site work could encroach upon the 	This Mitigation Measure is not relevant to the PSH Ordinance as PSH sites are anticipated to be infill in urban areas in close proximity to transit and therefore would not affect species movement. PSH projects would be required to comply with the City’s Tree Protection Ordinance (see RCM BIO-2 above).

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	<p>protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.</p> <ul style="list-style-type: none"> Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration. If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources. Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. 	
Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	<p>MM-BIO-6(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible.</p> <ul style="list-style-type: none"> Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program. Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. 	This Mitigation Measure is not relevant to the PSH Ordinance as PSH sites are anticipated to be infill in urban areas in close proximity to transit and therefore would not affect species movement. PSH projects would be required to comply with the City's Tree Protection Ordinance (see RCM BIO-2 above).

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Cultural Resources		
Paleontological resources, unique geological features.	<p>MM-CUL-1(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA 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.</p> <ul style="list-style-type: none"> Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources. Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. 	<p>Based on the SCAG Mitigation Measure, the following Mitigation Measure (included in the PSH Ordinance as a requirement – Construction Standard) will apply to projects undertaken pursuant to the PSH Ordinance:</p> <p>MM-CUL-3: Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to impact parent material with a moderate to high potential to contain unique paleontological resources, or to require the substantial alteration of a unique geologic feature. If the potential for paleontological resources exists, excavation in previously undisturbed soils shall be monitored by a qualified paleontologist. If potential paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines</p> <p>This measure would reduce the impact to a less than significant level.</p>
Historical resources, archeological resources.	<p>MM-CUL-2(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding 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 include:</p> <ul style="list-style-type: none"> Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has 	<p>Based on the SCAG Mitigation Measure, the following Mitigation Measures (included in the PSH Ordinance as requirements – Construction Standards) will apply to projects undertaken pursuant to the PSH Ordinance:</p> <p>MM-CUL-1: Identify the potential for an historical resource (as defined by Public Resources Code Section 21084.1 as determined by the Director, in consultation with the Office of Historic Resources) to be present on the site. Any project that may impact an historical resource identified in a Survey meeting the requirements of</p>

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	<p>been previously surveyed and whether historic resources were identified.</p> <ul style="list-style-type: none"> Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource. Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site. Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified. Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated. Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the 	<p>Public Resources Code section 5024.1(g), including Survey LA, unless determined by the Director of City Planning, in consultation with OHR, to not be a historical resource, shall comply with the Secretary of the Interior Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995).</p> <p>MM-CUL-2: Conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether archaeological resources are potentially present. If the potential for archeological resources exists, excavation in previously undisturbed soils shall be monitored by a qualified archeologist. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction personnel shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Significant archaeological resources affected by a project shall be protected and preserved.</p> <p>MM-CUL-3: Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to impact parent material with a moderate to high potential to contain unique paleontological resources, or to require the substantial alteration of a unique geologic feature. If the potential for paleontological resources exists, excavation in previously undisturbed soils shall be monitored by a qualified</p>

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	importance of these resources	<p>paleontologist. If potential paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines</p> <p>MM-TCR-1: Where excavation could extend below previously disturbed levels, notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site, if the Tribe has submitted to the Department of City Planning a request in writing to be notified of proposed projects in that area. If the potential for tribal resources exists, excavation in previously undisturbed soils shall be monitored by a qualified Tribal Monitor. If tribal resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until an appropriate Tribal Representative has evaluated the find. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the Project site. Any tribal resources shall be treated with appropriate dignity and protected and preserved as appropriate.</p> <p>These measures would reduce impacts to a less than significant level.</p>
Human remains.	MM-CUL-4(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation	<p>The following regulatory control measure would address this measure:</p> <p>RCM CUL-1: If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and</p>

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	<p>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"> In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. If any discovered remains are of Native American origin: Contact the County Coroner to contact the Native American Heritage Commission (NAHC) to ascertain the proper descendants from the deceased individual. The coroner should make 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. 	<p>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 California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:</p> <ul style="list-style-type: none"> Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays) If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours after being allowed access to the site to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.
Energy		
Residential and commercial energy use.	<p>MM-EN-2(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Integrate green building measures consistent with CALGreen into project design Use energy efficient materials in building design, construction, rehabilitation, 	<p>Qualified PSH Projects would be located near transit resulting in low fuel consumption and would be multi-family residential development, one of the most energy efficient housing types. See also regulatory control measures to reduce GHG emissions.</p>

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	<p>and retrofit.</p> <ul style="list-style-type: none"> • Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. • Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight. • Incorporate passive environmental control systems that account for the characteristics of the natural environment. • Use high-efficiency lighting and cooking devices. • Incorporate passive solar design. • Use high-reflectivity building materials and multiple glazing. • Prohibit gas-powered landscape maintenance equipment. • Install electric vehicle charging stations. • Reduce wood burning stoves or fireplaces. <p>Provide bike lanes accessibility and parking at residential developments.</p>	
Geology and Soils		
Earthquake or other seismic activity. Unstable geologic unit or soil, expansive soils.	<p>MM-GEO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault. • Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC. • Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas. • 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 design, grading, and construction practices in order to avoid or reduce geologic hazards. • Consistent with the CBC and local regulatory agencies with oversight of 	<p>PSH projects would not exacerbate geologic impacts.</p> <p>The following regulatory control measures would address this measure:</p> <p>RCM GEO-1: The design and construction of a project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.</p> <p>RCM GEO-2: Projects shall comply with the conditions contained within any Department of Building and Safety Geology and Soils Report Approval Letter.</p> <p>RCM GEO-3: Applicants to provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.</p> <p>RCM GEO-4: Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Applicants are required to implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following:</p> <ul style="list-style-type: none"> • Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15

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	<p>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.</p> <ul style="list-style-type: none"> • Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible. 	<p>through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.</p> <ul style="list-style-type: none"> • Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio- degradable soil stabilizer. <p>RCM GEO-5/HYD-1: National Pollutant Discharge Elimination System General Permit. Prior to issuance of a grading permit, Applicants shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002, Construction General Permit). Applicants shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. Storm Water Pollution Prevention Plans shall be prepared and implemented in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.</p>
Soil erosion, loss of top soil.	MM-GEO-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department 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	See above regulatory control measures that would address this measure.

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	<p>measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: <ul style="list-style-type: none"> File a Notice of Intent (NOI) with the SWRCB. Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project. After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB. Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils. 	
Greenhouse Gases		
GHG Emissions, plan consistency.	<p>MM-GHG-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region set forth below:</p>	<p>The following regulatory control measures would address this measure:</p> <p>GHG-1: Title 24 2016 standards and include ENERGY STAR appliances. An approximate 16% reduction in energy demand and associated GHG emissions is attributable to compliance with Title 24 standards and the installation of Energy Star appliances.</p> <p>RCM GHG-2: Construction waste is required to be reduced by at least 50 percent. AB 939 requires diversion of 50 percent of solid waste to landfills through source reduction, recycling, and composting. The California Solid</p>

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	<ul style="list-style-type: none"> Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. Off-site measures to mitigate a project's emissions. Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles. Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network. Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations. Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs. Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles. Land use siting and design measures that reduce GHG emissions. 	<p>Waste Reuse and Recycling Access Act of 1991 requires adequate storage areas for collection and storage of recyclable waste materials.</p> <p>RCM GHG-3: The LA Green Building Code, requires a schedule of plumbing fixtures and fixture fittings that reduce potable water use within development by at least 20 percent. Irrigation design and controllers are required that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. An approximate 16% reduction in water demand and associated GHG emissions is attributable to compliance with this measure.</p> <p>RCM GHG-4: PSH projects would use energy from the Los Angeles Department of Water and Power (LADWP), which is required to diversify its portfolio of energy sources to increase the use of renewable energy.</p> <p>RCM GHG-5: In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), PSH project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.</p>
Hazards		
Routine transport, use or disposal of hazardous materials, reasonably foreseeable upset, accident. Hazardous emissions near a school.	<p>MM-HAZ-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction 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"> Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. Where it is not feasible to avoid transport of hazardous materials, within one- 	<p>Based on the SCAG Mitigation Measure, the following Mitigation Measures will apply to projects undertaken pursuant to the PSH Ordinance:</p> <p>MM-HAZ-1: Projects that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial, or previously had a gas station or dry cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.2. A report setting forth the results of this database search shall be provided to the City and shall be made publicly available (e.g. historical</p>

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	<p>quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials.</p> <ul style="list-style-type: none"> Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project. Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects. Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. Avoid overtopping construction equipment fuel gas tanks. During routine maintenance of construction equipment, properly contain and remove grease and oils. Properly dispose of discarded containers of fuels and other chemicals. 	<p>environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations §312.10 Definitions). 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. All remediation shall be subject to City review and approval. Applicants shall consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination. No development shall occur until a letter of No Further Action is obtained, if required, by an appropriate agency.</p>
Hazardous materials sites, Government Code section 65962.5.	<p>MM-HAZ-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines; SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and 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"> Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for 	<p>The above Mitigation Measure MM-HAZ-1 would also address this measure.</p>

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	<p>remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.</p> <ul style="list-style-type: none"> Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. Use best management practices (BMPs) regarding potential soil and groundwater hazards. Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. Develop, train, and implement appropriate worker awareness and protective 	

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	<p>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.</p> <ul style="list-style-type: none"> • If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations. • Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. • Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. • Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. 	
Wildland fire risk.	<p>MM-HAZ-8(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • 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. • 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. • 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, 	Qualified PSH Projects are required to be located in urban areas (HQTAs) that are generally located well away from wildland interfaces, therefore this measure is not applicable.

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	<p>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.</p> <ul style="list-style-type: none"> 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. Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase. Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat. Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts. Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat. 	
Hydrology and Water Quality		
<p>Violation of water quality standards or waste discharge requirements. Alteration of site drainage, runoff exceeding stormwater drainage system capacity, other degrading water quality.</p>	<p>MM-HYD-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse. Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. Install structural water quality control features, such as drainage channels, 	<p>The following regulatory control measures would address this issue:</p> <p>See RCM GEO-1/HYD-1 above that would also address this measure.</p> <p>RCM HYD-2: Stormwater Best Management Practices for Demolition, Grading, and Construction Activities) Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.</p> <ul style="list-style-type: none"> Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills. Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.

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	<p>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.</p> <ul style="list-style-type: none"> • Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies. • Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. • Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. • Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. • Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters. • Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel. • Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs. 	<ul style="list-style-type: none"> • Dumpsters shall be covered and maintained. • Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting. <p>RCM HYD-3: Prior to the issuance of a grading permit, PSH projects to comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.</p> <p>RCM HYD-4: If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No.CAG994004) or subsequent permit. This will include submission of Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.</p> <p>RCM HYD-5: Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.</p> <p>RCM HYD-6: Best Management Practices required to be designed to retain or</p>

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		treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.
Depletion of groundwater supply, interfere with groundwater supply.	<p>MM-HYD-2(b): Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms with federal, state, regional, and local standards for sustainable management of groundwater basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.</p> <p>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.</p> <p>Avoid designs that require continual dewatering where feasible.</p> <p>Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface</p> <p>Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</p>	See above regulatory control measures that would also address this measure.
Structures within 100-year floodplain hazard area, risk due to levee or dam failure, seiche, tsunami, or mud flow.	<p>MM-HYD-8(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p>	Qualified PSH Projects would be located in urbanized areas that are generally well-protected from flood hazards and projects would be required to comply with state and local flood control requirements.

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	<ul style="list-style-type: none"> Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program. Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change. 	
Land Use		
Land use plans, policies and regulations.	<p>MM-LU-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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. 	PSH projects would be located in proximity to transit and would be consistent with plans and policies with respect to any potential physical environmental impacts.
Physically divide a community.	<p>MM-LU-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Consider alignments within or adjacent to existing public rights-of-way. Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods. Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: <ul style="list-style-type: none"> Alignment shifts to minimize the area affected Design new transportation facilities that consider access to existing community 	See also regulatory control measure RCM TR-1 below that would help address land use division during construction.

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	<p>facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project.</p> <ul style="list-style-type: none"> 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. 	
Mineral Resources		
Loss of availability of a known mineral resource.	<p>MM-MIN-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that 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 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"> Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures: Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources. 	Qualified PSH Projects would be located in urban areas where mineral extraction is not appropriate, therefore this measure is not applicable.
Noise		
Expose people to noise in excess of local standards. Excessive groundborne vibration or noise levels. Substantial permanent increase in noise	<p>MM-NOISE-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor's Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities</p>	<p>Based on the SCAG Mitigation Measure (included in the PSH Ordinance as requirements – Construction Standards), the following Mitigation Measure will apply to projects under taken pursuant to the PSH Ordinance:</p> <p>MM-NOI-1: No pile driving shall be allowed unless required due to geological conditions. For projects where piles would be necessary for construction due to geological</p>

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level. Substantial temporary increase in noise levels.	<p>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"> • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance. Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Designate an on-site construction complaint and enforcement manager for the project. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors. • Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors. • Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible. • Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way. • Use noise barriers to protect sensitive receptors from excessive noise levels 	<p>conditions, utilize quiet pile driving techniques such as vibratory piles.</p> <p>The following regulatory control measures would also address this measure:</p> <p>RCM NOI-1: LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. Demolition and construction activities are prohibited on Sundays and all federal holidays.</p> <p>RCM NOI-2: LAMC Sections 111.0 through 116.01 require that construction noise greater than 75 dBA at 50 feet is prohibited between the hours of 7 am and 10 pm within 500 feet of a residential zone unless compliance is technically infeasible. It is unlawful for any person to make loud, unnecessary and unusual noise that disturbs the quiet of any neighborhood.</p> <p>RCM NOI-3: PSH projects are required to comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.</p> <p>RCM NOI-4: LAMC Section 112.02 requires that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.</p>

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	<p>during construction.</p> <ul style="list-style-type: none"> Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls. Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. 	The Mitigation Measure above together with the regulatory requirements would reduce this impact to a less than significant level.
Expose people to excessive groundborne vibration or noise.	<p>MM-NOISE-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead 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"> For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. For projects where pile driving 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. 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. 	Mitigation Measure MM-NOI-1 above together with applicable regulatory control measures for Noise would also address this measure and reduce impacts to a less than significant level.
Population, Housing and Employment		
Displacement of housing requiring replacement housing elsewhere.	<p>MM-PHE-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction's housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Evaluate alternate route alignments and transportation facilities that minimize 	This measure is not applicable to Qualified PSH projects because they are not expected to involve displacement of housing. Additionally, Qualified PSH projects would be in compliance with the Housing Element of the City's General Plan.

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	<p>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.</p> <ul style="list-style-type: none"> • Prioritize the use existing ROWs, wherever feasible. • Develop a construction schedule that minimizes potential neighborhood detonation from protracted waiting periods between right-of-way acquisition and construction. 	
Public Services		
Adverse effects associated with new or physically altered government facilities for fire protection and emergency response.	<p>MM-PS-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide 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"> • Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements. • During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), 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-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. 	This measure is not applicable to Qualified PSH Projects because it is not anticipated that they would significantly impact fire protection or emergency services.
Adverse effects associated with new or physically altered government facilities for police protection.	<p>MM-PS-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including:</p> <ul style="list-style-type: none"> • Coordinate with public security agencies to ensure that there are adequate 	This measure is not applicable to Qualified PSH Projects because it is not anticipated that they would significantly impact police protection services.

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	<p>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.</p> <ul style="list-style-type: none"> Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel. 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. 	
Adverse effects associated with new or physically altered government facilities for schools.	<p>MM-PS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-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. 	This measure is not applicable to Qualified PSH Projects because it is not anticipated that they would significantly impact school services.
Recreation		
Increase use and physical deterioration of recreational facilities.	<p>MM-REC-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation</p>	This measure is not applicable to Qualified PSH Projects because it is not anticipated that they would significantly impact recreational facilities.

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	<p>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"> • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: Increasing the accessibility to natural areas for outdoor recreation, Promoting infill development and redevelopment to revitalize existing communities, Utilizing “green” development techniques, Promoting water-efficient land use and development, Encouraging multiple uses, Including trail systems and trail segments in General Plan recreation standards. • Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQT. 	
Traffic and Transportation		
Conflict with measures of effectiveness for performance of the circulation system.	<p>MM-TRA-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation. • Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides. • Provide a vanpool for employees. • Fund capital improvement projects to accommodate future traffic demand in the area. • Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement, Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document), Signage and striping onsite to encourage bike safety, Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, 	<p>The following regulatory control measure would address this measure:</p> <p>RCM TR-1: A construction work site traffic control plan is required to be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans must show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties, as applicable to individual project construction plans. All construction related traffic is restricted to off-peak hours.</p>

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	<p>bulb outs, etc.) to encourage convenient crossing at arterials, Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan, Direct transit sales or subsidized transit passes, Guaranteed ride home program o Pre-tax commuter benefits (checks), On-site car-sharing program (such as City Car Share, Zip Car, etc.), On-site carpooling program, Distribution of information concerning alternative transportation options o Parking spaces sold/leased separately, Parking management strategies; including attendant/valet parking and shared parking spaces.</p> <ul style="list-style-type: none"> • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas. • Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible. • Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. • Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work. • Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs. • Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles. • Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions. • Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. • Purchase, or create incentives for purchasing, low or zero-emission vehicles. • Create local "light vehicle" networks, such as neighborhood electric vehicle systems. • Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles. • Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles. • Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives. • Project Selection: Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. o Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. • Public Involvement: Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services. • Transit and Multimodal Impact Fees: Assess transit and multimodal impact fees 	

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	<p>for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations.</p> <ul style="list-style-type: none"> o Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. • System Monitoring: Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency. • Arterial Traffic Management: Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. • Signal Synchronization: Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic. • HOV Lanes: Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. • Delivery Schedules: Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas, Implement and supporting trip reduction programs, Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives. • Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities. • Bicycle and Pedestrian Trails: Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations. • Bicycle Safety Program: Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers. • Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects. • Bicycle Parking: Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists). • Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation; Eliminate or reduce minimum parking requirements for new buildings; "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space); Use parking pricing to discourage private vehicle use, especially at peak times; Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times; Encourage shared parking programs in mixed-use and transit-oriented development areas. • Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: Promote the use of peripheral parking by increasing on-site parking rates and offering reduced 	

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	<p>rates for peripheral parking; Encourage special event center operators to advertise and offer discounted transit passes with event tickets; Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking; Promote the use of bicycles by providing space for the operation of valet bicycle parking service.</p> <ul style="list-style-type: none"> • Parking “Cash-out” Program: Require new office developments with more than 50 employees to offer a Parking “Cash-out” Program to discourage private vehicle use. • Pedestrian and Bicycle Promotion: Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. • Fleet Replacement: Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models. 	
Conflict with applicable Congestion Management Plan.	<p>MM-TRA-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions:</p> <ul style="list-style-type: none"> • Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: Advocate for a regional, market-based system to price or charge for auto trips during peak hours. Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation. Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. • Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management 	Qualified PSH Projects have low trip generation and are required to be located near transit (in HQTAs). Significant impacts are not anticipated and therefore this measure is not applicable.

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	<p>plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency: A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes. Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. Location of construction staging areas for materials, equipment, and vehicles at an approved location. A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit Provision for accommodation of pedestrian flow. As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces. Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense, within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, Repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy. Any heavy equipment brought to the construction site shall be transported by truck, where feasible. No materials or equipment shall be stored on the traveled roadway at any time. Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion. All equipment shall be equipped with mufflers. Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors. Promote "least polluting" ways to connect people and goods to their destinations.</p> <ul style="list-style-type: none"> • Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency: Ensure transportation centers are multi-modal to allow transportation modes to intersect. Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail. To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges. Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations. Coordinate schedules and routes across service lines with neighboring transit authorities. Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles). Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so. Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The 	

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	<p>use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles. Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets. Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible.</p> <ul style="list-style-type: none"> • Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: Ensure transit stops and bus lanes are safe, convenient, clean and efficient. Ensure transit stops have clearly marked street-level designation, and are accessible. Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate. Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one half mile. • Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including: Develop a Regional Pass system to reduce the number of different passes and tickets required of system users. Implement “Smart Bus” technology, using GPS and electronic displays at transit stops to provide customers with “real-time” arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service). Investigate the feasibility of an on-line trip-planning program. • Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including: Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic. Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access. • Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: Designate a certain percentage of parking spaces for ride-sharing vehicles. Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles. Provide a web site or message board for coordinating shared rides. Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit. Hire or designate a rideshare coordinator to develop and implement ridesharing programs. • Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including: Provide assistance to regional and local ridesharing organizations. Advocate for legislation to maintain and expand incentives for employer ridesharing programs. Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes. Provide public recognition of effective programs through awards, top ten lists, and other mechanisms. • Implement a “guaranteed ride home” program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program. • Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations. • Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers. • Work with existing shuttle service providers to coordinate their services. • Facilitate employment opportunities that minimize the need for private vehicle trips, including: <ul style="list-style-type: none"> o Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations. 	

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	<p>Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.</p> <ul style="list-style-type: none"> • Enforce state idling laws for commercial vehicles, including delivery and construction vehicles. • Organize events and workshops to promote GHG-reducing activities. • Implement a Parking Management Program to discourage private vehicle use, including: Encouraging carpools and vanpools with preferential parking and a reduced parking fee. Institute a parking cash-out program. Renegotiate employee contracts, where possible, to eliminate parking subsidies. Install on-street parking meters with fee structures designed to discourage private vehicle use. Establish a parking fee for all single-occupant vehicles. • Work with school districts to improve pedestrian and bicycle to schools and restore school bus service • Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities. • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. • Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers. • Synchronize traffic signals to reduce congestion and air quality. • Work with community groups and business associations to organize and publicize walking tours and bicycle events. • Support legislative efforts to increase funding for local street repair. 	
<p>Inadequate emergency access.</p> <p>Impair or interfere with Emergency Response Plan or Evacuation Plan.</p>	<p>MM-TRA-5(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. Scheduling of truck trips outside of peak morning and evening commute hours. Limiting of lane closures during peak hours to the extent possible. Usage of haul routes minimizing truck traffic on local roadways to the extent possible. Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. Development and implementation of access plans for highly sensitive land uses such as police 	<p>Regulatory Control Measure RCM TR-1 above would also address this measure during construction.</p>

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	<p>and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. Storage of construction materials only in designated areas. Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.</p> <ul style="list-style-type: none"> • Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. • Enhance emergency preparedness awareness among public agencies and with the public at large. • Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities, Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format, Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function. 	
Utilities and Service Systems		
Require new or expanded entitlements for wastewater treatment.	<p>MM-USS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on utilities and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8, and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan.</p> <p>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>The following regulatory control measures would address this measure: RCM GEO-1/HYD-1 above. RCM UTIL-1: As part of the normal construction/building permit process, Applicants are required to confirm that the capacity of the existing wastewater infrastructure system can supply the needs of projects during construction and operation.</p>
Require new or expanded entitlements for water supply.	<p>MM-USS-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter –Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and applicable County, City or other Local provisions. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>The following regulatory control measures would address this measure: RCM UTIL-2: Projects are required to comply with the Water Management Ordinance, No. 170,978, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and</p>

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	<ul style="list-style-type: none"> Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code. Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation. Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface. 	<p>overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).</p> <p>RCM UTIL-3: As part of the normal construction/ building permit process, Applicants are required to confirm that the capacity of the existing water infrastructure system can supply the needs of projects.</p>
Landfill capacity.	<p>MM-USS-6(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities, Inclusion of a waste management plan that promotes maximum C&D diversion, Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.), Reuse of existing structure and shell in renovation projects, Design for deconstruction without compromising safety, Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components, Development of indoor recycling program and space, Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities, Locally generated waste should be 	<p>The following regulatory compliance measure would address this measure:</p> <p>RCM UTIL-4: All waste required to be disposed of properly. Use of appropriately labeled recycling bins is required to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.</p> <ul style="list-style-type: none"> (Operational.) Recycling bins to be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. (Demolition/Construction.) Prior to the issuance of any demolition or construction permit, Applicants shall provide a copy of the receipt or contract from a

APPENDIX A PSH ORDINANCE CONSISTENCY WITH 2016 RTP/SCS PROJECT LEVEL MITIGATION MEASURES		
Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to PSH Ordinance
	disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required, Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. o Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices, Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities, Develop alternative waste management strategies such as composting, recycling, and conversion technologies, Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts, Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard), Integrate reuse and recycling into residential industrial, institutional and commercial projects, Provide recycling opportunities for residents, the public, and tenant businesses, Provide education and publicity about reducing waste and available recycling services, Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates, Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes. To facilitate on-site separation and recycling of demolition- and construction-related wastes, contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.
SOURCE: 2016 SCAG RTP/SCS FEIR; Impact Sciences, 2017		

VII. MITIGATION MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). This Mitigation Monitoring Program (MMP) has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines. The City of Los Angeles is the Lead Agency for this project.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, this environmental document identified regulatory compliance measures, or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Proposed Project. This Mitigation Monitoring Program (MMP) is designed to monitor implementation of the mitigation measures identified for the Project.

The MMP is subject to review and approval by the City of Los Angeles as the Lead Agency as part of the approval process of the project, and adoption of project conditions. The required mitigation measures are listed and categorized by impact area, as identified in the MND.

The MMP describes the procedures for the implementation of the mitigation measures to be adopted for the Proposed Project as identified in the MND. The City of Los Angeles Department of City Planning (DCP) and other City Departments (e.g., Department of Building and Safety) shall be responsible for administering the MMP activities or delegating them to staff, other City departments (e.g., Department of Building and Safety [DBS], etc.), consultants, or contractors. The Monitoring or Enforcing Agencies identified herein, at their discretion, may require an applicant or operator to pay for one or more independent environmental monitor(s) (hired by the City or the applicant or operator at the City’s discretion) to be responsible for monitoring implementation of mitigation measures (e.g., City building inspector, project contractor, certified professionals, etc., depending on the requirements of the mitigation measures).

Each mitigation measure for the Proposed PSH Ordinance is identified in **Table 7-1** and is categorized by environmental topic and corresponding number, with identification of:

- The Implementing Agency – this is in most cases, the DCP or DBS, as well as the City Council in the adoption of standards in the PSH Ordinance.
- The Enforcement Agency and Monitoring Agency – this is the agency or agencies that will monitor the measure and ensure that it is implemented in accordance with this MMP.
- Monitoring Phase / Monitoring Actions – these are the criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.

VII. Mitigation Monitoring Program

All agencies and departments are in the City of Los Angeles, unless otherwise noted. By adopting this MMP, the City Council hereby authorizes and delegates the implementing, enforcement, and monitoring agencies the responsibility to determine the applicability and compliance of all mitigation measures in their reasonable discretion. A number of mitigation measures apply to subsequent development projects.

A number of mitigation measures are implemented through the adoption of standards in the PSH Ordinance. In implementing those mitigation measures, the PSH Ordinance shall provide that the decision-maker for approval of individual projects under the PSH Ordinance shall review for substantial conformance with the environmental standards, as applicable to subsequent projects.

TABLE 7.1: MITIGATION MONITORING PROGRAM				
No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase / Monitoring Frequency / Monitoring Actions
CULTURAL RESOURCES				
CUL-1	Identify the potential for an historical resource (as defined by Public Resources Code Section 21084.1 as determined by the Director, in consultation with the Office of Historic Resources) to be present on the site. Any project that may impact an historical resource identified in a Survey meeting the requirements of Public Resources Code section 5024.1(g), including Survey LA, unless determined by the Director of City Planning, in consultation with OHR, to not be a historical resource, shall comply with the Secretary of the Interior Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995).	¹ City Council ² Department of City Planning, Office of Historic Resources	¹ City Council ² Department of City Planning ³ Department of Building and Safety	¹ Adoption of PSH Ordinance Standards ² Pre-construction of subsequent development approvals / Approval from Department of City Planning Office of Historic Resources approval, Issuance of a building permit
CUL-2	Conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether archaeological resources are potentially present. If the potential for archeological resources exists, excavation in previously undisturbed soils shall be monitored by a qualified archeologist. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction personnel shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section	¹ City Council ² Department of City Planning ³ Department of Building and Safety	¹ City Council ² Department of Building and Safety	¹ Adoption of PSH Ordinance Standards ² Pre-construction of subsequent development approvals/ Applied to subsequent development approvals that involve excavation and construction at construction/ Inclusion in grading permit specifications. If resources are found, submission to DBS and DCP of report

VII. Mitigation Monitoring Program

	21083.2. Significant archaeological resources affected by a project shall be protected and preserved.			documenting appropriate treatment of resources by a qualified archaeologist.
CUL-3	Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to impact parent material with a moderate to high potential to contain unique paleontological resources, or to require the substantial alteration of a unique geologic feature. If the potential for paleontological resources exists, excavation in previously undisturbed soils shall be monitored by a qualified paleontologist. If potential paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines.	¹ City Council ² Department of City Planning ³ Department of Building and Safety	¹ City Council ² Department of Building and Safety	¹ Adoption of PSH Ordinance Standards ² Pre-construction of subsequent development approvals/ to be applied to subsequent development approvals that involve excavation and construction at construction/ Inclusion in grading permit specifications. If resources are found, submission to DBS and DCP of report documenting appropriate treatment of resources by a qualified archaeologist, geologist, or paleontologist. Submittal of paleontological remains, reports and surveys to the Los Angeles County Natural History Museum.

HAZARDS AND HAZARDOUS MATERIALS				
HAZ-1	Projects that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.2. A report setting forth the results of this database search shall be provided to the City and shall be made publicly available (e.g. historical environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations §312.10 Definitions). 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. All remediation shall be subject to City review and approval. Applicants shall consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination. No development shall occur until a letter of No Further Action is obtained, if required, by an appropriate agency.	¹ City Council ² Department of City Planning ³ Department of Building and Safety	¹ City Council ² Department of Building and Safety	¹ Adoption of PSH Ordinance Standards ² Pre-construction of subsequent development approvals / Preparation of Phase I and/or Phase II Environmental Site Assessment, and remediation, as needed prior to issuance of grading and construction permits.
NOISE AND VIBRATION				
NOI-1	No pile driving shall be allowed unless required due to geological conditions. For projects where piles would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as vibratory piles.	¹ City Council ² Department of Building and Safety	¹ City Council ² Department of Building and Safety	¹ Adoption of PSH Ordinance Standards ² Pre-construction of subsequent development approvals / Inclusion in

				grading permit specifications for subsequent development approvals
TRIBAL CULTURAL RESOURCES				
TCR-1	Where excavation could extend below previously disturbed levels, notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site, if the Tribe has submitted to the Department of City Planning a request in writing to be notified of proposed projects in that area. If the potential for tribal resources exists, excavation in previously undisturbed soils shall be monitored by a qualified Tribal Monitor. If tribal resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until an appropriate Tribal Representative has evaluated the find. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the Project site. Any tribal resources shall be treated with appropriate dignity and protected and preserved as appropriate.	¹ City Council ² Department of City Planning ³ Department of Building and Safety	¹ City Council ² Department of Building and Safety	¹ Adoption of PSH Ordinance Standards ² Pre-construction of subsequent development approvals / To be applied to subsequent development approvals that involve excavation and construction at construction/ Inclusion in grading permit specifications. If resources are found, submission to DBS and DCP of report documenting appropriate treatment of resources by a qualified archaeologist, geologist, or paleontologist. Submittal of paleontological remains, reports and surveys to the Los Angeles County Natural History Museum.
SOURCE: Impact Sciences, 2018.				

VIII. SUPPLEMENTAL ANALYSIS

This section presents staff-initiated supplemental analysis to the Permanent Supportive Housing Ordinance Mitigated Negative Declaration and Addendum to the 2016 Southern California Association of Governments Regional Transportation Plan Environmental Impact Report. This supplemental analysis to the MND and Addendum is provided to clarify the analysis conducted as it relates to changes made to the Proposed Project subsequent to publication of the MND. The supplemental analysis does not substantially revise or cause the need for a substantial revision to the MND under CEQA Section 15073.5(b). Therefore, recirculation is not necessary. The supplemental analysis provided does not change any of the conclusions presented in the MND or the Addendum, but rather clarifies and provides additional relevant information. In addition to the changes described below, other technical amendments were made to the PSH Ordinance that also do not materially change any of the analysis or conclusions presented in the MND or the Addendum.

1. Additional Concessions and Incentives

On December 14, 2017, the City Planning Commission (CPC) considered the Proposed Project and recommended that the City Council adopt the ordinance, as amended. At that time, the CPC amended the Proposed Ordinance to increase the number of additional incentives that an individual PSH Project may request, from 4 incentives (as initially analyzed in the MND), to 5 incentives. The concessions or incentives, as described in the Proposed Ordinance and in the MND, allow for specified modifications in development standards, including but not limited to adjustments to yard/setback requirements, increases in allowable Floor Area Ratio, increases in height, or reductions in open space requirements. Additionally, the CPC revised the setback incentive to allow any number of setback adjustments on a property to count towards one of the allowed incentives out of five.

These changes do not materially affect the methodology and assumptions presented in the MND, nor do they have the potential to result in new significant environmental impacts. All of the types of incentives that are included in the current version of the PSH Ordinance were assumed in the analysis of the MND and the Addendum. The change to allow 5 instead of 4 incentives does not materially change any of the analysis. Additionally, it is not anticipated that these changes would materially impact the size, scale, or potential impacts of individual PSH projects developed as a result of the Proposed Ordinance.

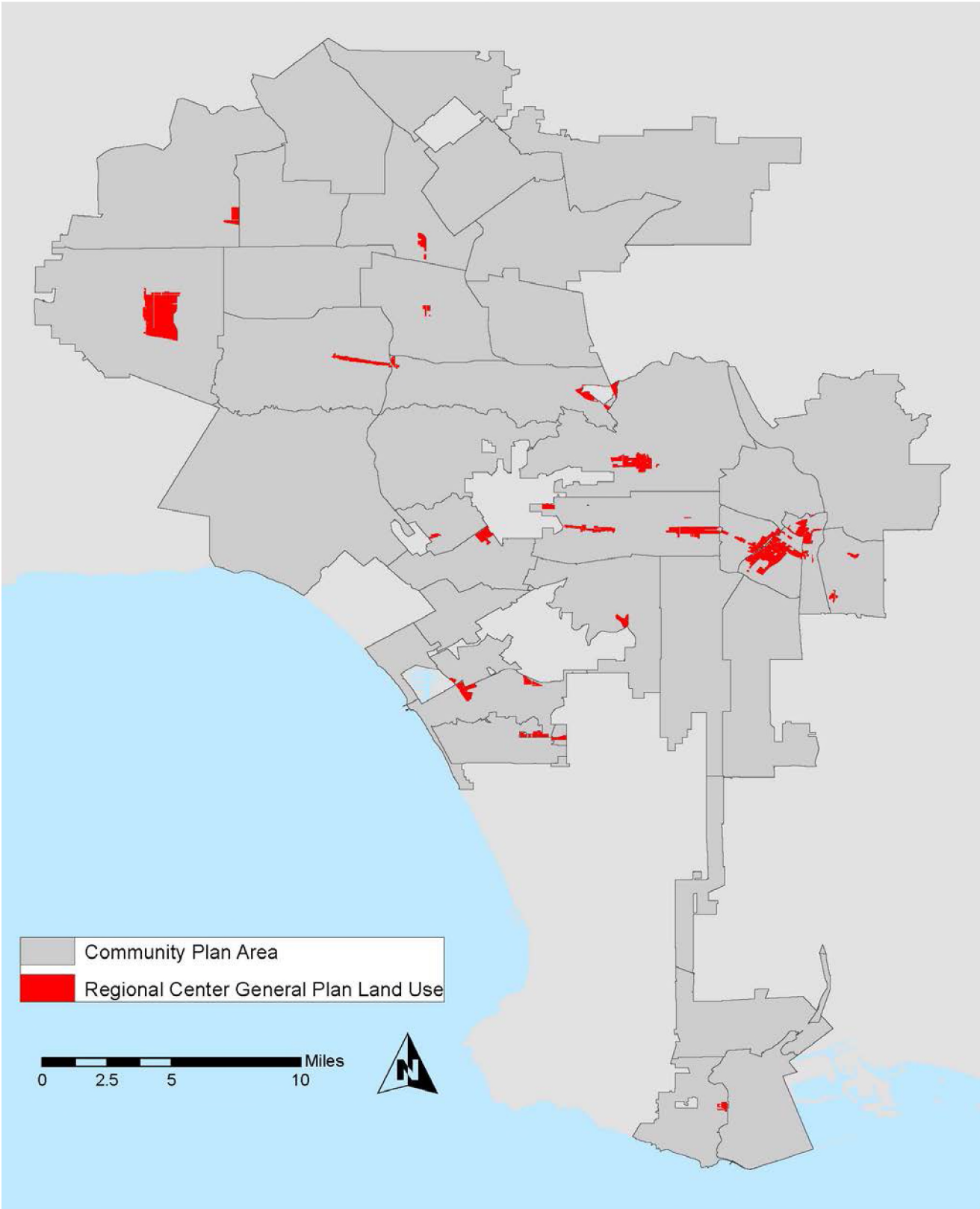
2. Site Plan Review Threshold

The CPC further amended the Proposed Ordinance on December 14, 2017 to modify the proposed Site Plan Review thresholds for PSH Projects. As initially analyzed in the MND, the Proposed Ordinance would increase the threshold for Site Plan Review to 120 units for qualifying PSH projects, or 200 units for qualifying PSH projects located in the Greater Downtown Housing Incentive Area. The CPC amended this provision to extend the threshold for Site Plan Review to 200 units for qualifying PSH projects located on a lot with a general plan land use designation of Regional Center Commercial, Regional Commercial, or Regional Mixed Commercial. This would include areas of the City that are planned for higher intensity development and are similar in form to Downtown Los Angeles, such as Hollywood, Warner Center, Koreatown and mid-Wilshire (see *Figure VIII-1*, on the following page).

This change does not affect the methodology and assumptions presented in the MND, nor does it have the potential to result in new significant environmental impacts. The analytical assumption regarding the average size of a PSH project that would be developed as a result of the ordinance is based on an analysis of past project sizes, along with a set of reasonable assumptions about how projects may be larger as a result of the proposed ordinance. Current PSH projects average 60 units per project. Based on the various concessions in the PSH Ordinance, it was determined that projects may increase slightly from historical developments, up to 75 units. The reasonableness of the City's assumption is supported by the letter dated March 9, 2018 submitted by PSH developer, PATH Ventures, and the letter dated March 9, 2018 submitted by the Supportive Housing Alliance, a network of twelve PSH developers.

Additionally, evidence indicates that there is no substantial difference in potential impacts between a 75 unit PSH project and a 120 or 200 unit PSH project. As discussed in a February 21, 2018 letter from Impact Sciences, whether the projects contain 75 units or 200 units would not materially change the air quality analysis presented in the MND. Impact Sciences bases this analysis in substantial part on the difference in traffic trips compared to more traditional residential projects, and the effect of fewer traffic trips, and a lesser demand for parking, including subterranean parking. Based upon this, after reviewing the MND and Addendum, the Department of City Planning does not find this change to the project requires any new or additional analysis in the MND or Addendum. Projects larger than 75 units are unlikely, and if they were constructed, they would be constructed in denser areas of the City that are well served by mass transportation, public services, and public facilities, and would not foreseeably result in any new or different impacts from those identified in the MND or Addendum.

Figure VIII-1. Map of Regional Center GPLU Designation



3. Oil Drilling

On March 6, 2018, the Planning and Land Use Management (PLUM) Committee of the City Council amended the construction standard provided in Sub-subparagraph 14.00 A.13(g)(13)(iv) of the Proposed Ordinance to include a new requirement for projects which involve soil disturbance on sites which have a current or past use as an oil well or gas well/oil drilling site, in addition to those which have a current or past use as a gas station or dry cleaning facility. This amendment to the ordinance is intended to clarify how existing regulation would apply to PSH projects, and is not a new mitigation measure.

Existing Regulatory Compliance Measures are in place to ensure that oil and gas wells (“oil wells”) are appropriately abandoned to current legal standards, as monitored and verified by the Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), before approval of a development project on the site. Any properties which are near or contain an oil well are flagged in the City’s Zone Information and Map Access System (ZIMAS). If flagged, the Department of Building and Safety (LADBS) refers the applicant to DOGGR. DOGGR must provide clearance to LADBS that construction may proceed prior to issuance of a building permit for the site. Specifically, the current process is as follows:

- Anytime an applicant seeks a permit from LADBS, LADBS staff will search the City’s Zone Information and Map Access System (ZIMAS) and Plan Check and Inspection System (PCIS). These geographical information systems (GIS) systems include DOGGR and historical data indicating where oil wells are in the City. Note: the City’s GIS database is currently being updated to include the most current data from the Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) on oil wells and is expected to be completed within 2-3 months.
- If ZIMAS or PCIS indicates an oil well is on or near the site, LADBS will not issue any permits for new construction, relocation, additions or use of land. LADBS will direct the applicant to request that DOGGR send the City a letter to determine if DOGGR confirms there is or is not a well on site and to determine if the oil well has been abandoned to current legal standards. No permit will be issued until the Fire Department signs off that the permit complies with life, health and safety Fire Code regulations. [Los Angeles Fire Code Section 105.7.1.3, Los Angeles Ordinance No. 182,822, Sections 5706.3.16 and 5703.3.17; LAMC 91.7109.2.]. DOGGR letters are reviewed by the Fire Department, in consultation with the Petroleum Administrator.
- DOGGR in collaboration with the LAFD Harbor Industrial Units (HIU) Oil Well Inspector will determine (based upon historical data and records) if the well in question has been abandoned to current legal standards.

- If historical records document the oil well was abandoned to current legal standards, the Fire Department and the Petroleum Administrator will review the well records along with the permit application and associated development plans to determine if permits can be issued based on Fire Code standards. Review of the plans will also ensure the development of the site allows future access to the oil well. The Petroleum Administrator will make the final determination on the safety of development of the site. The Fire Department will only issue a Clearance for permits post Petroleum Administrator signing off on the safety of development on the site.
- If historical records indicate the well on site has not been abandoned to current legal standards and/or the well will need to be re-abandoned to meet current legal standards for any reasons; including grading regulations; then DOGGR, LAFD, and the Petroleum Administrator will have oversight. At this point the LAFD HIU Oil Well Inspector will issue a Notice of Violation to the Owner requiring the Well to be abandoned to current legal standards. The LAFD Oil Well Inspector along with DOGGR will oversee the actual abandonment of the well to ensure the abandonment is compliant with current legal standards.
- If a grading or shoring permit needs to be issued in order to cap the oil well, an Early Start Permit for site excavation and shoring can be applied for and issued with Fire Department concurrence and sign off so that the oil well can be properly abandoned and capped to DOGGR standards.
- The abandonment of an oil well is fully regulated by State Oil and Gas law and is overseen by DOGGR. (Cal. Public Res. Code, §§ 3106 and 3203.) Title 14, Section 1723.5 of the California Code of Regulations states that all well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this grade regulation, a permit from the Division is required before work can start.) In general, DOGGR determines a well may be considered adequately abandoned when both the record review and onsite evaluation process reflect that steps have been taken to isolate all oil-bearing or gas-bearing strata encountered in the well, and to protect underground or surface water suitable for irrigation or farm or domestic purposes from the infiltration or addition of any detrimental substance, and to prevent damage to life, health, property, and other resources. (Cal. Public Res. Code, § 3208.) Sections 3208 and 3255(a)(3) of the Public Resources Code give the Division the authority to order the re-abandonment of any well that is hazardous, or that poses a danger to life, health, or natural resources. According to Section 3208.1 of the Public Resources Code, if any property owner, developer, or local permitting agency either fails to obtain an opinion from the Division, or fails to follow the advice of the Division when development occurs near an oil or gas well, then the owner of the property on which the well is located may be responsible for re-abandonment costs should a future problem arise with the well.
- Once oil well is abandoned, the Fire Department in consultation with the Petroleum Administrator will review the plans to ensure the development of the site allows future

access to the oil well and complies with the Fire Code regulations. See **attachment 'A'** for DOGGR guidance related to construction in and around abandoned oil wells.

- Once the Fire Department Oil Well Inspectors have signed off that the development will comply with the Fire Code, including spacing requirements, the Fire Department ("Development Services") will sign off on permits being issued and LADBS can issue permits.
- The following regulatory agencies have oversight of development and remediation of hazards related to oil wells:
 - DOGGR
 - LADBS
 - LAFD Development Services
 - LAFD Harbor Industrial Unit (HIU)
 - LA County Fire CUPA (Hazardous Materials & Waste)
 - Department of Toxic Substance Control
 - Water Board

Based upon the above, there is no change to the conclusion in the MND that there will be less than significant impacts related to hazardous materials, including through imposition of MM HAZ-1.

4. Additional Design Standards

On February 13, 2018, the PLUM Committee of the City Council amended the design standards included in Paragraphs 13(g)(4) and 13(g)(5) of the Proposed Ordinance to modify the requirements pertaining to façade transparency and building massing, and added two new design standards to require screening of mechanical equipment. The result of these amendments is to propose stricter design standards. On March 6, 2018, the PLUM Committee also made additional modifications to the incentives available to Qualified PSH Projects located in the RD1.5 Zone to require stricter transitional height requirements and a reduced floor area ratio (FAR) incentive. These amendments are intended to ensure further compatibility between individual PSH Projects that may be developed as a result of the Proposed Ordinance, and surrounding neighborhoods zoned for lower density. These changes do not materially affect the methodology and assumptions presented in the MND, nor do they have the potential to result in new significant environmental impacts. They would not foreseeably change any of the assumptions related to the number or location of PSH units or in any other way affect impacts to the environment, with the exception of having beneficial aesthetic impacts through improved design.

ATTACHMENT A

Well Review Program: Introduction and Application

Resources Agency of California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

Well Review Program

Introduction and Application

Resources Agency of California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources



Revised: December 14, 2007

WELL REVIEW PROGRAM INTRODUCTION

The Division of Oil, Gas, and Geothermal Resources (Division) offers the Well Review Program to address significant and potentially dangerous issues associated with development near oil or gas wells. The program provides important information on the current status of all known wells located on a development site property, and it provides other important information when development occurs near oil or gas wells. The Division provides this information in an advisory role, so that responsible decisions can be made by the property owner, developer, and local permitting agency when development occurs near oil or gas wells.

The Division strongly encourages participating in the Well Review Program. According to Section 3208.1 of the Public Resources Code, if any property owner, developer, or local permitting agency either fails to obtain an opinion from the Division, or fails to follow the advice of the Division when development occurs near an oil or gas well, then the owner of the property on which the well is located may be responsible for reabandonment costs should a future problem arise with the well. Reabandonment costs for oil and gas wells can be significant.

This introduction to the Division's Well Review Program is divided into two parts. The first part discusses significant and potentially dangerous issues associated with development near oil or gas wells. The second part gives a detailed step-by-step overview of the Well Review Program.

PART I: Significant and Potentially Dangerous Issues

The property owner, developer, and local permitting agency should be aware of, and fully understand, the following significant and potentially dangerous issues associated with development near oil or gas wells:

1. The property owner is always responsible for providing access to any well located on the property, if reabandonment becomes necessary. This means the property owner is responsible for removing any structure or obstacle that prevents or impedes access to a well. This includes, but is not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, and decking. The Division is also not responsible for the rebuilding or replacing of any structure or obstacle that needs to be removed to gain access to a well. According to Section 3255 of the Public Resources Code, the Division may order the reabandonment of any well that poses a danger to life, health, or natural resources.
2. The Division makes no guarantees that wells properly abandoned to current standards will not start leaking oil, gas, and/or water after abandonment. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thorough the well was plugged and abandoned. The Division acknowledges wells that are abandoned to current standards have a

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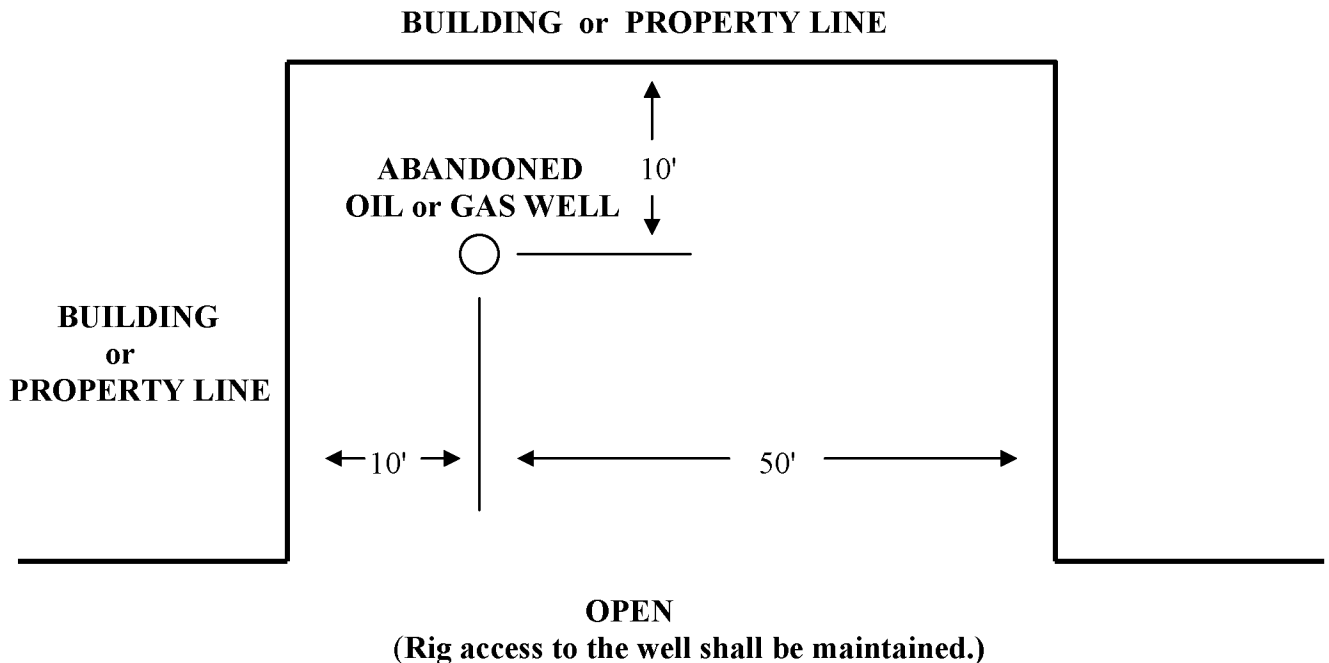
lower probability of leaking oil, gas, and/or water after abandonment, but makes no guarantees about the abandonment.

3. Due to the reasons stated in comments 1 and 2 above, the Division recommends the following:
 - a. **The Division recommends maintaining access to all oil and gas wells.**
 - b. **The Division recommends abandoning all oil and gas wells to current standards.**

The Division recommends following both **a & b** for each well located on the development site property. However, if recommendation **a** is not followed for each well located on the development site property, then the owner of the property on which the well is located shall be held responsible for reabandonment costs should a future problem arise with the well (see comment 4 below).

4. The Division advises not to undertake construction or development that will prevent access to any oil or gas well. If such construction or development is undertaken against the advice of the Division, then, according to Section 3208.1 of the Public Resources Code, the owner of the property on which the well is located shall be held responsible for reabandonment costs should a future problem arise with the well. Again, Section 3255 of the Public Resources Code gives the Division the authority to order the reabandonment of any well that poses a danger to life, health, or natural resources.
5. Maintaining access to an oil or gas well shall be defined as 1) maintaining rig access to the well, and 2) not building over, or in close proximity to the well.
 - 1) Rig access shall be defined as a route from a public street or road to the well, solely over the property on which the well is located. An abandonment rig, and any necessary equipment, shall be able to pass along and over the route, from a public street or road to the well.
 - 2) Close proximity shall be defined as being within ten feet from the property line and/or structure. The distance shall be measured from the center of the well extending out to the side of the property line and/or structure. To be considered outside of close proximity, two adjacent sides shall be no less than ten feet, with the third side no less than 50 feet. The third side needs to be no less than 50 feet to allow room for the 30 to 40 feet lengths of tubing required for reabandonment operations. Other building configurations that can accommodate the rig and the tubing lengths may also be acceptable. The fourth side shall remain open to the well for potential reabandonment operations, and rig access to the well shall be maintained (see figure below).

Resources Agency of California
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Division of Oil, Gas, and Geothermal Resources



6. The Division recommends the use of surface mitigation measures, where appropriate. Examples of surface mitigation measures include venting systems for wells, venting systems for parking lots, patios, and other hardscape, methane barriers for building foundations, methane detection systems, and collection cellars for well fluids. The Division does not regulate the design, installation, or operation of such measures because they are outside of the Division's expertise. The Division only recommends that such surface mitigation measures are designed, installed, and operated by qualified engineers. The permitting of surface mitigation measures falls under the authority of local government.
7. During the course of development, if any unknown wells are discovered, the Division must be notified immediately, so the unknown well(s) can be incorporated into the Well Review Project. In addition, the Division recommends any soil containing significant amounts of hydrocarbons to be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.
8. No well work shall be performed on any oil or gas well without written approval from the Division. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, and lowering or raising well casings for development purposes. The Division regulates the depth of the well below final grade. Section 1723.5 of the California Code of Regulations states that all well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any of the wells need to be lowered or raised (i.e. casing cut down or casing riser added) to accomplish this, then the applicant needs a permit from the Division for those wells before work can start.

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Division of Oil, Gas, and Geothermal Resources

9. Well Review Projects expire two years after their review date. This is to assure the public of a relatively recent review and evaluation effort by the Division before development starts. If a Well Review Project has expired, and development hasn't started, then the Division strongly encourages the property owner, developer, or local permitting agency to once more participate in the Well Review Program before the development starts.
10. The Division recommends attaching Well Review Projects to the title of the development site property. This is to ensure that present and future property owners are aware of 1) the wells located on the property, and 2) significant and potentially dangerous issues associated with development near oil or gas wells.

Again, the property owner, developer, and local permitting agency should be aware of, and fully understand, the above comments which discuss significant and potentially dangerous issues associated with development near oil or gas wells. The Division provides this information in an advisory role, so that responsible decisions can be made by the property owner, developer, and local permitting agency when development occurs near oil or gas wells.

PART II: Step-by-Step Overview

The following is a detailed step-by-step overview of the Well Review Program:

Step 1 - Application. The applicant (developer / property owner) needs to submit a fully completed Well Review Program Introduction and Application to the Division. All pages in the Well Review Program Introduction need to be initialed by the applicant or a representative of the applicant. The Well Review Program Application needs to be completed and signed by the applicant or a representative of the applicant. Failure to accurately complete all required information on the Well Review Program Application may cause delay in the processing of the Well Review Project.

Step 2 - Locate Wells. The applicant needs to locate all known wells located on the development site property. All well excavations need to follow Cal/OSHA guidelines for grading and/or shoring. If necessary, the Division can assist in locating the wells.

Step 3 - Submit Plan. The applicant needs to submit a preliminary copy of the development site plan to the Division for review. The plan needs to show, at a minimum, the boundary of the development site property with all known wells plotted on the property, final grade of the development site property, and a visual bar scale. The preferable form of plan submittal is *Adobe PDF*, emailed to the Division.

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Step 4 - GPS Wells. The Division needs to GPS all known wells located on the development site property with equipment that has a margin of error of less than one meter. The latitude and longitude of each well shall be in the NAD 83 coordinate system.

Step 5 - Review Wells. The Division needs to review all known wells located on the development site property. The review process consists of determining the abandonment status of the wells by examining past plugging operations, and then comparing the abandonment status with current abandonment standards.

Step 6 - Evaluate Wells. The Division needs to evaluate all known wells located on the development site property. The evaluation process consists of 1) verifying the wells have a competent surface plug, and 2) verifying the wells are not leaking any fluids or gas. Any metal plates attached to the top of casings must be removed prior to the evaluation of a well. Methane gas can build up pressure underneath metal plates. The applicant is responsible for the safe removal of all metal plates. After all known wells located on the development site property have passed the evaluation process, a metal ID plate needs to be attached to the top of the well casing. The metal plate should be skip welded only, not welded with a full bead. This is to allow any potential gas leakage to vent out of the casing and prevent pressure from building up in the wellhead. For identification purposes, the metal ID plate needs to show the well's name and API number.

NOTE: Safety is always the first priority when evaluating wells. The two main safety concerns are adequate ventilation and proper grading and/or shoring of the well excavation. The well excavation needs to follow Cal/OSHA guidelines. Division staff will not evaluate a well if it is unsafe to do so.

Step 7 - Restore Well Sites. After the wells have been evaluated, the Division is also responsible for ensuring proper well site restoration for public safety. Proper well site restoration includes the removal of all associated well equipment, junk, and debris. The well excavation needs to be filled with earth, compacted properly to prevent settling, and graded over. Pursuant to Section 1776 of the California Code of Regulations, well site restoration must be completed within 60 days following the evaluation of a well. The well site restoration inspection can be waived if the developer signs the Well Site Restoration Waiver Form. Please contact the Division for a copy of the form.

Step 8 - Well Review Letter. After the Division has conducted a review and evaluation of all known wells located on the development site property, and the well sites have been restored, the Division will issue a Well Review Letter to the applicant and the local permitting agency. The Well Review Letter will list the current status of all known wells located on the development site property, and it will provide other important information associated with development near oil or gas wells. A well is considered abandoned to current standards when it has passed both the review process (**Step 5**) and the evaluation process (**Step 6**).

Resources Agency of California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

WELL REVIEW PROGRAM APPLICATION

APPLICANT INFORMATION
Developer: (Company Name)
Contact Person: (Mr./Ms. Name, Title)
Mailing Address: (Street Address City, State Zip)
Telephone #:
Email:
Development Project Title:
Development Site Address: (Street Address City, State Zip)

PERMITTING AGENCY INFORMATION
Permitting Office:
Plan Checker: (Mr./Ms. Name, Title)
Mailing Address: (Street Address City, State Zip)
Telephone #:
Email:

The Division of Oil, Gas, and Geothermal Resources recommends the following:

- a. The Division recommends maintaining access to all oil and gas wells.**
- b. The Division recommends abandoning all oil and gas wells to current standards.**

I have read and understand the above two recommendations. I have read and understand the Well Review Program Introduction (pages 1 - 7).

Name (please print): _____ Title: _____

Signature: _____ Date: _____

IX. ERRATA

This section presents staff-initiated text changes to the Permanent Supportive Housing Ordinance Mitigated Negative Declaration (MND) and the Addendum to the 2016 Southern California Association of Governments Regional Transportation Plan Environmental Impact Report (Addendum). This text change reflects revisions to the MND and Addendum subsequent to publication. Deleted text is shown in ~~striketrough~~ and new text is underlined. The revision clarifies a regulatory compliance measure to indicate how it is implemented. The revised text does not substantially revise or cause the need for a substantial revision to the MND under CEQA Section 15073.5(b). Therefore, recirculation of the MND is not necessary. Nothing in the clarification identifies a new significant impact or the need for new mitigation measures, or any other way affects the impact conclusions in the MND or the Addendum.

1. Cultural Resources

To clarify the process for compliance with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, the following revision is made to page IV-19 to IV-20 of the MND and page 64 to 65 of the Addendum:

RCM CUL-1: If human remains are encountered unexpectedly during construction demolition and/or grading 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 California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48

hours after being allowed access to the site to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

X. RESPONSE TO COMMENTS

This document contains comments received by the City of Los Angeles (City) during and after the public review period for the proposed Permanent Supportive Housing (PSH) Ordinance Mitigated Negative Declaration (MND).

The Draft MND was initially circulated for a 20-day public review period beginning on November 30, 2017 and closing on December 20, 2017. The Draft MND was re-noticed for a 30-day public review period beginning on January 11, 2018 and closing on February 12, 2018 to allow for additional opportunity for public review and comment. Additionally, the draft Permanent Supportive Housing Ordinance (PSH Ordinance) was circulated for a 60-day public review period beginning on August 31, 2017 and closing on October 30, 2017.

During both review periods, written comment letters were received on the proposed Permanent Supportive Housing Ordinance, the Draft MND and the Addendum from public agencies, groups and individuals. Responses to comments on the PSH Ordinance are provided in the PSH Ordinance Staff Report dated December 14, 2017. The CEQA statute and guidelines do not require the lead agency to provide written responses to comments to a MND or an addendum. The City is providing responses to comments in three letters submitted during and after the comment period on the MND that include all of the substantive comments received on the environmental analysis as of March 20, 2018. While the City received additional comment letters that raised issues with the environmental analysis, they are duplicative of issues raised in the three letters identified in this Response to Comments.

This document contains both specific responses to specific comments on the Draft MND and general responses where specific comments were not needed. For specific responses to specific comments, the comments are numbered in the actual letters, the comments are summarized above the City's response and a corresponding numbered response is provided. (Copies of the actual letters, marked up to show how the comments are numbered, are included as an attachment to this document).

LETTER NO. 100

December 20, 2017

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(two copies were submitted on behalf of Venice Vision and the Oxford Triangle Association)

General Response to Comments regarding Procedures

The Commenter makes a number of arguments related to the City violating CEQA's procedural requirements. As a general matter and to the extent the City does not provide a specific response, the City disagrees with the legal conclusions the Commenter makes in its arguments.

Specifically, the City disagrees that the PSH Ordinance was required to be sent to the State Clearinghouse (SCH) and noticed for 30 days pursuant to CEQA Guidelines Section 15206(b)(2). The PSH Ordinance is not a development project, but a zoning ordinance of citywide application. Therefore, subsection (b)(2) is not applicable to the City's project. Although the City disagrees with the claims that it violated CEQA's noticing requirements, the City recirculated the document and sent its notice to the SCH to provide additional opportunities to members of the public, including your clients, to provide comments on the MND and the Addendum, as well as any State agencies noticed by the SCH. The City has not and does not waive its argument and position that the PSH Ordinance was not required to be sent to the SCH.

The Commenter argues that the City Planning Commission improperly took action on the MND without considering all public comments because the public comment period was open when the CPC considered the matter. There is no requirement that the MND public review period needs to be closed prior to consideration by a recommending body of a project and the MND prepared for the project. The decisionmaker on the PSH Ordinance is the City Council. CPC is a recommending body on legislative actions, such as the PSH Ordinance. The City Council, as the decisionmaker, will be required under CEQA to consider all comments on the MND prior to adoption. The CPC motion to recommend the City Council adopt the MND after consideration of all comments on the MND and the entire administrative record, in its independent judgment, did not violate CEQA.

To the extent that the original MND notice had technical deficiencies under CEQA Guidelines Section 15072(g), these were non-prejudicial, and were corrected in the January 11, 2018 Notice of Intent to Adopt.

Comment 100-1

City's Staff report and MND provide unclear and conflicting information regarding the applicability of the PSH Ordinance to the Venice Dell Pacific Site and the Thatcher Yard Site.

Response 100-1

The City disagrees that the MND fails to provide clear information, or conflicts with the CPC report or any other information in the record, related to the Venice Dell Pacific Site, the Thatcher Yard Site, or any other particular sites, including those identified in Table 4 to the MND on Page II-20 or the Addendum in Table 5, Page 38-39. The MND, the Addendum, and the Staff report provide that it is currently unknown where projects that would utilize the PSH Ordinance would be built and developed. In the interest of meeting the requirements of CEQA and providing as much information as the City has at this time, in good faith, the MND and the Addendum, discussed the existing program referred to as the "Affordable Housing Opportunity Site" initiative. As identified in the MND and the Addendum, the Affordable Housing Opportunity Site (AHOS) initiative is a City program to identify City-owned properties to be used for affordable housing projects, not just permanent supportive housing projects, or to be disposed at fair market value. There were an initial eight (8) sites identified in Round One. The Round One properties are included in the MND and the Addendum. But, as explained in the MND and the Addendum, just because these sites were included in Round One does not necessarily mean they are adequate to meet the requirements of the Permanent Supportive Housing Ordinance. As discussed in the Staff Report, one of the properties identified, Venice Dell Pacific site is zoned Open Space and would not qualify under the PSH Ordinance requirements. Additionally, while the City has entered exclusive negotiating agreements (ENAs) for four of the eight Round One sites, including the Thatcher Yard site, there is no project that has been agreed to and applied for with the City. There is no development proposal on file. This is explained in the Staff report, the MND and the Addendum. Therefore, it is unknown if any particular Round One site will utilize the PSH Ordinance. Additionally, as there are no submitted development proposals, these Round One site "projects" cannot be reasonably be analyzed as cumulative projects. Finally, testimony by the affordable housing providers in the ENA's for the Thatcher Yard and the Venice Dell Pacific sites testified that they do not intend to utilize the PSH Ordinance for any project they propose. Therefore, there is no inconsistency in the MND or Addendum and the City has disclosed all information necessary to make the MND and Addendum informational documents and comply with CEQA. Finally, the City agrees with the Commenter to the extent that if there are any future discretionary approvals related to any of the Round One or later round sites, whether they utilize the PSH Ordinance or otherwise, CEQA will be required. While the commenter has requested that the PSH Ordinance be amended to include this requirement, the City finds that it is unnecessary as it is required pursuant to CEQA statute and the guidelines.

Comment 100-2

Inadequate Project Description – Failure to identify all potential PSH City owned land. The MND needs to explain which Round One Properties will be subject to separate environmental review, which are addressed in the MND, and which are considered exempt from environmental review with and without the PSH Ordinance. The environmental document for the project needs to provide site-specific analysis for known project sites.

Response 100-2

See response to 100-1. All known City-owned properties that have been identified for potential development under the AHOS initiative are identified in the MND and the Addendum, including in Table 4 and Figure 5 of the MND. Otherwise, a map of all eligible parcels in the City for the use of the PSH Ordinance is identified in Figure 4 to the MND.

Comment 100-3

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency’s Research and Evaluation Unit in their review of housing studies found that larger projects may result in increased crime.

Response 100-3

The evidence cited pertaining to the potential impact of affordable housing and crime has no direct relevance to the proposed Project, as the discussion paper evaluated the impact of project size on crime rates for affordable housing more generally, rather than providing a specific focus on permanent supportive housing. The discussion paper notes that “the body of research examining the effect of affordable housing on neighborhood crime is not substantial.”¹ In fact, the paper cites only one study which measured the relationship between supportive housing and neighborhood crime rates in Denver, CO. That study found that while there is a small increase in neighborhood crime rates within 500 feet of PSH project sites with more than 53 units, PSH residents were the victims of the increased crime, rather than the perpetrators.²

Other studies suggest that the development of permanent supportive housing does not lead to an increase in crime rates, regardless of project size. For example, a 2013 study found that, compared to nearby control neighborhoods, supportive housing residences “have no discernable

¹ Minnesota Housing Finance Agency. *Discussion Paper, [Impact of Affordable Housing on Communities and Households](#)*, page 10.

² Galster, G., K. Pettit, A. Santiago, and P. Tatian. 2002. The Impact of Supportive Housing on Neighborhood Crime Rates. *Journal of Urban Affairs*. 24(3): 289-315.

negative impact on their surrounding neighborhoods' character and stability," including crime risk and crime incidents.³

Furthermore, potential impacts on neighborhood crime are required to be analyzed under CEQA only to the extent that they bear a potential impact on public services and the need for new or additional facilities. There is a breadth of research which provides strong evidence that permanent supportive housing has positive impacts on public services and police services, as it provides stability to people who are at high risk of violence and crime while they are unsheltered. People who are housed in permanent supportive housing are less likely to use emergency department, mental health, substance abuse, emergency shelter, criminal justice and inpatient hospital systems, than those who are unsheltered. This reduced dependence on public services is often illustrated in terms of public costs. One study reported that the typical public cost for residents in supportive housing in Los Angeles is \$605 per month, compared to an estimated public cost for similar persons experiencing homelessness of \$2,897 per month, or about five-times greater.⁴ Specifically, studies⁵ have shown that supportive housing results in decreased incarcerations and criminal justice system costs incurred by residents: in San Francisco, residents of supportive housing spent 44 fewer days incarcerated;⁶ in New York, the number of days spent in prison decreased 74 percent and the number of days spent in jail decreased 40 percent;⁷ in California, days of incarceration decreased 80 percent;⁸ in Los Angeles, Sheriff general jail costs were 95 percent lower for those in supportive housing compared to those who were experiencing homelessness.⁹

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis is needed related to impacts on crime.

³ Arch City Development, Urban Decision Group. 2013. *Permanent Supportive Housing Impact Analysis: Property Values, Land Use and Crime in Columbus, Ohio Neighborhoods with National Church Residences Permanent Supportive Housing*, page 11.

⁴ Economic Roundtable, *Where We Sleep: Costs When Homeless and Housed in Los Angeles* (Los Angeles: 2009).

⁵ All studies cited in San Francisco Board of Supervisors, Board Inquiry #20110104-006, Supportive Housing Costs and Benefits Review, October 11, 2011, <http://sfbos.org/sites/default/files/FileCenter/Documents/48238-Supportive%20Housing%20Lit%20Review%20BOS%20Inquiry.pdf>

⁶ Harder+Company Community Research, *The Benefits of Supportive Housing: Changes in Residents' Use of Public Services: DRAFT*, Corporation for Supportive Housing; February 2004.

⁷ Dennis Culhane, Stephen Metraux and Trevor Hadley, "Public Service Reductions Associated with Placement of Homeless Persons with Severe Mental Illness in Supportive Housing," *Housing Policy Debate* 13 (January 2002).

⁸ California Department of Mental Health, *Effectiveness of Integrated Services for Homeless Adults with Serious Mental Illness* (Sacramento, 2002).

⁹ Economic Roundtable, 2009.

Comment 100-4

The MND should address the fact that there is evidence that PSH facilities may lead to a decrease in property values when located in higher income areas.

Response 100-4

Property Values are a social/economic impact and are not an impact category that is analyzed under CEQA. In addition, the staff report prepared for the Proposed Ordinance provides evidence indicating that PSH does not have any negative impact on property values.

Comment 100-5

Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 2000 units over 10 years, as part of the preparation of the environmental document for the Ordinance, the City should have consulted with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

Response 100-5

The requirements under CEQA Guidelines Section 15155 do not apply to a citywide code amendment, but rather apply on an individual project basis. Specifically, these requirements apply to individual residential development projects with more than 500 dwelling units. Projects with more than 500 dwelling units would not be eligible for ministerial review under the proposed Permanent Supportive Housing Ordinance.

Furthermore, analysis provided in the Mitigated Negative Declaration indicates that the City has adequate water supply for any development which may occur as a result of the proposed Project.

Comment 100-6

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care area or inhibit out-migration of homeless. The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

Response 100-6

This evidence is not relevant to the Proposed Project, and does not provide substantial evidence of a potential impact. The evidence cited in this comment does not demonstrate that the construction of PSH induces in-migration; rather, it merely states that the construction of PSH units does not result in a one-to-one reduction in a region's population of persons experiencing homelessness. The study cites a number of reasons that could explain why this correlation has been found, including errors in homeless count data, poor targeting, and other issues, and does not indicate strict causality between the construction of PSH units and in-migration of additional

persons experiencing homelessness. Moreover, the study finds that the construction of PSH units leads to a net decrease in a region's homeless population, citing that one additional PSH unit reduces homeless counts by 0.10 people.

A March 2018 study found that there may be other factors contributing to increases in the population of people experiencing homelessness. In particular, the study found that the reduction in funding resources for affordable housing and permanent supportive housing as a result of the elimination of redevelopment and state bond financing has contributed to a 14% rise in homelessness from 2016 to 2017.¹⁰

Furthermore, according to the Los Angeles Homeless Services Authority (LAHSA) January 2017 Point in Time Count, there are approximately 34,289 persons experiencing homelessness in the City of Los Angeles. This is a small percentage (<1%) of the overall population growth projected in the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) adopted by the Southern California Association of Governments (SCAG), which anticipates up to 4,609,400 persons; 1,690,300 households and 2,169,100 jobs in the City of Los Angeles by 2040.

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis or review is needed related to growth-inducing impacts.

Comment 100-7

The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND) and should address the potential cumulative impacts associated with the City's full Comprehensive Homeless Strategy.

Response 100-7

The MND analyzes the Interim Motel Conversion Ordinance, as well as, the 10,000 Measure HHH funded units, as cumulative projects as required by CEQA at pages IV-74-76. The Addendum analyzes the Interim Motel Conversion Ordinance as a cumulative project at page 129. As the Commenter has not provided any substantial evidence supporting cumulative impacts, no further response or review is necessary.

Comment 100-8

The MND does not adequately analyze the impact of PSH projects, including the proposed project at Thatcher Yard, on schools. The proposed increases in density will create additional demand. Among other things, additional infrastructure may need to be constructed to accommodate the demand. Such reasonably foreseeable impacts should be disclosed, analyzed and mitigated.

¹⁰ California Housing Partnership, *California's Housing Emergency: State Leaders Must Immediately Reinvest in Affordable Homes*, March 2018, <https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2018/03/CHPC-State-Housing-Need-Report-2018-Web.pdf>

Response 100-8

As discussed in the MND, the PSH Ordinance is not growth-inducing, and is expected to house a population that is already present in the City and already attends local schools.

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis or review is needed related to impacts on school infrastructure.

Comment 100-9

Many of the proposed locations where PSH projects will be constructed, including the proposed location at Thatcher Yard, contain (or previously contained) subterranean fuel storage tanks. Such tanks are known to create hazards that should be analyzed in the MND.

Response 100-9

The types of uses that are associated with underground storage tanks (UST), are included in the MM-HAZ-1. Specifically USTs are associated with gas stations and industrial uses. Any prior use of the site for gas stations or zoning for industrial uses would trigger the requirement for MM-HAZ-1, including electronic database search, a Phase I, a Phase II and ultimately remediation if recommended by environmental professionals. Based on this MM, the MND concluded a less than significant impact. The commenter has not provided substantial evidence that an impact will occur. No further response or review is necessary and the MND and the Addendum are adequate.

LETTER NO. 101

February 12, 2018

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(two copies were submitted on behalf of Venice Vision and the Oxford Triangle Association)

Comment 101-1

Project splitting – failure to analyze the whole of the action – production of PSH housing per City’s Comprehensive Homeless Strategy: The MND does not make clear why the PSH Ordinance would only apply to 200 units per year, and not the full number of PSH units anticipated as a result of gap funding. At a minimum the environmental document should analyze construction of the full 1,200 units per year, for a total of 12,000 units. To do otherwise would be to fail to analyze the project as a whole and to engage in project splitting when it comes to the City’s production of PSH units, and any other types of homeless

housing units. It therefore appears that the MND for the PSH Ordinance is an example of project splitting. This is not cured by the limited statements regarding cumulative impacts contained in the MND.

Response 101-1

As a zoning ordinance, the City is required to analyze the reasonably foreseeable impacts of the PSH Ordinance using its best efforts to forecast what the result of adopting the PSH Ordinance would be. The City's best efforts at forecasting the effects of the PSH Ordinance resulted in a determination that the PSH Ordinance will have the foreseeable effect of resulting in 200 units a year for 10 years, based on projected development activities from the existing funding sources and the efficiencies and savings created by the PSH Ordinance. This estimate was supported by testimony by PSH developers at the Homelessness and Poverty Committee and the Planning and Land Use Management (PLUM) Committee hearings on the PSH Ordinance who testified that the PSH Ordinance will result in financial savings that will result in additional units. There is no evidence that the PSH Ordinance will have the reasonably foreseeable effect of constructing 12,000 units. The record establishes that the existing plans and zoning allow development of permanent supportive housing. While the PSH Ordinance is making amendments to the City's zoning ordinance in relation to PSH development, it is not changing or readopting the existing land use plans and zoning that allows PSH units throughout the City on multi-family zoned parcels and would currently allow tens of thousands of PSH units. The PSH Ordinance is also not changing or readopting the existing funding programs that are expected to result in the already reasonably forecasted 10,000 units to be developed. To the extent the City has changed the location, size or massing of future PSH projects, the MND and Addendum analyze that. But the substantial evidence in the record supports the City's determination that the PSH Ordinance will not foreseeably result in more than 2,000 units over 10 years.

As the City recognized that the 10,000 units funded by Measure HHH and other pre-existing funding sources, are not yet built, the City analyzed the Measure HHH 10,000 units in ten years as a cumulative project in the MND. Additionally, the Addendum analyzed both the Measure HHH (and other existing funding sources) and the City's PSH Ordinance units under SCAG's RTP/SCS PEIR to determine if they are consistent with build-out impact analysis of the SCAG region in the PEIR. Based on this, the City adequately and conservatively analyzed the whole of the project as required by CEQA.

Comment 101-2

Project splitting – failure to analyze the whole of the action – City's Motel Conversion Ordinance: The MND fails to discuss the City's proposed Interim Motel Conversion Ordinance as part of the larger housing production strategy for the homeless. Rather than address the Motel Conversion Ordinance as part of the project, the MND treats it as a cumulative project. This is an additional example of project splitting.

Response 101-2

See Response 100-7. The Interim Motel Conversion Ordinance (IMCO) is independent of the PSH Ordinance. While both policy initiatives are intended to address homelessness in the City, neither project is dependent on the other or the reasonably foreseeable outcome of the other. Both have independent utility and the City would pursue either without the other. There is no basis for finding the City has impermissibly piecemealed these projects. As discussed above, the IMCO is analyzed as a cumulative project.

Comment 101-3

Flawed project assumptions – potential underestimation of impacts: The MND’s assumption that PSH developments would be approximately 75 units per project is not supported by substantial evidence, and if this were the typical project size, there would be no need for the Ordinance to include a CEQA Exemption for individual projects with up to 120 units (200 in downtown), as the existing CEQA Exemption for individual projects with up to 100 units would be adequate. These flawed project assumptions have the potential to result in the underestimation of project impacts.

Response 101-3

As discussed in the MND, the analytical assumption regarding the average size of a PSH project that would be developed as a result of the ordinance is based on an analysis of past project sizes, along with a set of reasonable assumptions about how projects may be larger as a result of the proposed ordinance. Current PSH projects average 60 units per project. With the most generous assumptions, it is reasonably foreseeable that the Proposed PSH Ordinance could result in projects up to 75 units, based on cost savings and other concessions.

Discussion with PSH providers has provided additional information to substantiate this assumption. While it is possible that a larger project could be developed using the proposed ordinance (up to 120 units, or 200 units Downtown), there are a number of additional considerations which determine anticipated project size apart from zoning regulations (see letters dated March 9, 2018 from the Supportive Housing Alliance and PATH Ventures provided as **attachments ‘A’ and ‘B’**). Generally, PSH providers prefer to operate PSH projects that are no larger than 75 units, as they are sensitive to and have an expressed desire to fit within the surrounding community. Due to the cost-prohibitive nature of land acquisition and the lack of larger available sites, it is difficult to locate sites that can physically accommodate more than 75 units. PSH projects tend to attain optimal efficiencies from an operational standpoint (considering the costs of providing supportive services and property management) when they are between 60 and 70 units. From a construction cost standpoint, PSH finance consultants advise that an optimal project size is between 50 and 60 units, as this project size maximizes the financing strategy available through Measure HHH financing paired with 4% Low Income Tax Credits. Finally, for projects that utilize Measure HHH financing, a Project Labor Agreement is required for projects

with more than 65 units, which can trigger additional project costs, narrow the pool of qualified subcontractors and lead to construction delays.

Additionally, evidence indicates that there is no substantial difference in potential impacts between a 75 unit PSH project and a 120 or 200 unit PSH project (see letter from Impact Sciences provided as **attachment 'C'**) and Supplemental Analysis. As discussed in a February 21, 2018 letter from Impact Sciences, whether the projects contain 75 units or 200 units would not materially change the air quality analysis presented in the MND. The analysis would not materially change whether an individual PSH project contains 75, 120 or 200 units.

Comment 101-4

Inadequate project description – failure to adequately disclose and analyze new CEQA exemption created by the project: The project description in the MND fails to adequately make clear that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23.

Response 101-4

The proposed ordinance does not establish a new CEQA exemption for PSH projects. The City has no authority under CEQA to establish a CEQA exemption. The City has fully disclosed the project features of the PSH Ordinance, including that the project will result in changing the rules such that some projects that would currently need to go through a discretionary review will be subject to ministerial review under the PSH Ordinance. (See MND at II-13.) To the extent that future projects only require ministerial decisions by the City, they would be exempt from CEQA by operation of law (Public Resources Code Section 21080(b)(1)). To the extent they would include any discretionary approval, such as a Coastal Development Permit, CEQA review would be triggered (CEQA Guidelines Section 15060(c)(1), and Section 15378(c)).

Comment 101-5

Inadequate project description – failure to identify all potential PSH City PF Zoned land: In terms of City-owned property and sites in the Public Facilities Zone (PF), the environmental documents identify only the seven Round One Properties, and indicates that subsequent properties will be identified. The MND cannot be used as the environmental clearance for PSH projects unless they are more specifically identified in the MND; Figure 4 is insufficient.

Response 101-5

See Responses 100-1 and 100-2.

Comment 101-6

Inadequate project description – failure to identify development potential of Round One Properties: The MND needs to explain which Round One Properties (MND Table 5, MND pages 38-39) will be subject to

separate environmental review, which are addressed in the MND, and which are considered exempt from environmental review with and without the PSH Ordinance. The MND needs to identify the development potential of the Round One Properties. The environmental document for the project needs to provide site-specific analysis for known project sites. It does not do so, and is therefore inadequate.

Response 101-6

See Response 100-1 and 100-2.

Comment 101-7

Project impacts – aesthetics: There is nothing in the ordinance that precludes the use of reflective materials and limits exterior materials to wood, brick or similar materials. The conclusion that glare impacts would be less than significant is therefore not supported by substantial evidence.

Response 101-7

As stated in the MND, sources of daytime glare are typically associated with mid- to high-rise buildings with exterior facades largely or entirely comprised of highly reflective glass or mirror-like materials. As discussed, the average expected size of individual PSH projects developed as a result of the proposed ordinance is 75 units. These projects would not be expected to be mid- to high-rise buildings. Furthermore, the development of PSH units is cost constrained by the availability of public funding, and as such it is not reasonably foreseeable that new PSH buildings would have exterior facades treated with higher cost finishes such as highly reflective glass or mirror-like materials.

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis or review is needed related to impacts on aesthetics.

Comment 101-8

Project impacts – air quality:

- a) The MND's assumption that PSH developments would be less than 80 units is not supported by substantial evidence and, if this were the typical project size, there would be no need for the Ordinance to provide a CEQA exemption for 120 units (200 in downtown) as the existing CEQA exemption would be adequate.*
- b) The PSH Ordinance and PSH construction in the City may result in population increases that have not been addressed in the projections underlying the Air Quality Management Plan (AQMP). Evidence exists to support an argument that the PSH Ordinance is not consistent with the AQMP. In addition, the analysis should address the full number of PSH units anticipated to be developed per year over the next ten years.*
- c) The analysis is fatally flawed because it does not analyze the project as a whole (the full number of PSH and other homeless housing units constructed per year and over the life of the project).The*

model runs have not been included as an appendix to the MND; the reader is therefore precluded from checking the assumptions in the model runs.

Response 101-8

- a) See discussion in Response 101-3 for additional information about the assumptions regarding the size of PSH projects. Additionally, evidence indicates that there is no substantial difference in potential impacts between a 75 unit PSH project and a 120 or 200 unit PSH project, particularly as excavation is expected to be minor (see letter from Impact Sciences provided as **attachment 'C'**). See also Supplemental Analysis. As discussed in a February 21, 2018 letter from Impact Sciences, whether the projects contain 75 units or 200 units would not materially change the air quality analysis presented in the MND. The analysis would not materially change whether an individual PSH project contains 75, 120 or 200 units.
- b) The adopted AQMP accommodates population growth forecasts from the 2016 Regional Transportation Plan/Sustainable Communities Strategy, which anticipates up to 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs in the City of Los Angeles by 2040. As discussed in Response 100-6, there is no substantial evidence indicating that the PSH Ordinance would result in population increases that have not been included in the RTP/SCS population growth forecast.
- c) See discussion in Response 101-1.

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis or review is needed related to air quality impacts.

Comment 101-9

Project impacts – biological resources:

- a) *Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Regulatory Compliance Measure RCM BIO-1 and BIO-2 be enforced? As written the PSH Ordinance does not require compliance with these measures. The potential for impacts remains.*
- b) *The discussion under 4(d) states that there is an absence of habitat in High Quality Transit Areas (HQTAs) within the City of Los Angeles and that no significant wildlife movement occurs through potential PSH sites. However, Figure 4 of the MND appears to show eligible parcels along the I-405 through the Santa Monica Mountains. There are wildlife corridors and important habitat linkages along this segment of the I-405. The statement is not supported by substantial evidence and the potential for impacts remains.*

Response 101-9

- a) The cited Regulatory Compliance Measures are legal requirements that apply to all development projects, regardless of the level of CEQA review that is completed. Both the Federal and State governments prohibit the taking of migratory birds. (50 C.F.R. Sec. 10.13;

Cal Fish and Game Code 3513). The Migratory Bird Act is Federal law and makes a federal crime to take a migratory bird. The Migratory Bird Treaty Act (MBTA) makes it illegal to “take” or kill by any means 1,026 species of birds. (16 USCA §§ 703 to 708, 709a, 710, 711). These laws are enforced by US Fish and Wildlife Services. (<https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php>.) It is a misdemeanor to violate any provision of the Act with punishment of a maximum fine of \$15,000 or imprisonment up to six months or both, § 707(a). Pursuant to Fish and Wildlife guidance and based on discussions with the City’s environmental consultant, Impact Sciences, the only effective means to comply with federal and state law is to avoid grading activities during nesting season or conducting site surveys prior to construction. Additionally, the City’s Tree Ordinance is existing City law and requires a tree permit to take down a protected tree. The commenter has provided no substantial evidence to support impacts to biological resources. No further comment or analysis is required.

- b) Development along the 405 in the Santa Monica Mountains is not foreseeable. The sites along the I-405 indicated on the map in Figure 4 of the MND are zoned for Public Facilities. However, further analysis shows that these sites would not be eligible for development under the PSH Ordinance, as they are located adjacent to zones which do not allow multifamily residential development (including the A1, RE and OS zones). As described on page II-17 and page II-22 of the MND, development of PSH would be permitted in the Public Facilities zone only if the uses and standards of the least restrictive adjacent zone would allow for multifamily residential uses. The map provided in the MND was provided for general informational purposes only, and does not necessarily indicate that all sites shown as “eligible” would be utilized for PSH.

Additionally, the applicant cites to a map prepared by the Santa Monica Mountain Conservancy to support the existence of wildlife habitat. From the City’s review of this map there is no basis to find it was prepared by a biologist or otherwise provides substantial evidence of the existence of wildlife corridors. From the City’s research, the map, which was prepared using Google earth and SMMC staff’s personal knowledge requires ground-truthing by a qualified biologist on this matter that requires technical expertise. There is no evidence this has been done. The Commenter does not provide substantial evidence of an impact from the project to biological resources.

Comment 101-10

Project impacts – cultural resources: Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-CUL-1, MM-CUL-2, MM-CUL-3 be enforced? As written the PSH Ordinance does not require compliance with this measure. The potential for impacts remains.

Response 101-10

Consistent with the requirements of CEQA and incorporating mitigation measures into a project, all Mitigation Measures have been incorporated in the Proposed Ordinance as requirements that must be satisfied prior to approval of individual projects. Specifically, compliance with MM-CUL-1, MM-CUL-2 and MM-CUL-3 is required under Subparagraphs 14.00 A.13(g)(13) and 14.00 A.13(g)(14) of the Proposed Ordinance.

Comment 101-11

Project impacts – geology and soils: Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Regulatory Compliance Measure RCM GEO-1, RCM GEO-2, RCM GEO-3, RCM GEO-4, RCM GEO-5/HYD-1, be enforced? For any “Regulatory Compliance Measure” cited in the MND, the specific reference for the regulatory requirements (code, ordinance, etc) should be cited so the reader can be sure the specified measure is in fact a regulatory requirement and not a mitigation measure.

Response 101-11

The cited Regulatory Compliance Measures are legal requirements that apply to all development projects, regardless of the level of CEQA review that is completed. Specifically, the following Los Angeles Building Code Section references apply to the cited Regulatory Compliance Measures:

RCM GEO-1: LAMC Section 91.1613 Earthquake Loads

RCM GEO-2: LAMC Section 91.1803 Geotechnical Investigations

RCM GEO-3: LAMC Section 91.7006.7.2 General Conditions

RCM GEO-4: LAMC Chapter IX, Division 70 Grading, Excavation and Fills

RCM GEO-5: LAMC Section 91.106.4.1 Exception 14 and 15

Comment 101-12

Project impacts – hazards and hazardous materials:

- a) Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-HAZ-1 be enforced? As written the PSH Ordinance does not require compliance with this measure.*
- b) The conclusion that there will be no impacts related to airport clear zones and accident potential zones is not supported by substantial evidence, and the MND should include figures overlaying the PSH eligible parcels shown in Figure 4 and the relevant airport clear and accident potential zones.*
- c) The MND relies on the statement that PSH projects would be located in HQTAs and therefore not in hilly or mountainous areas. However, as shown on the Southern California Association of Governments’ maps of the HQTAs, large parts of the City, including some hilly areas, are located*

within a HQTAs. The statement is not supported by substantial evidence and the potential for impacts remains.

- d) *The statement that PSH projects are located within HQTAs and therefore not within a 100-year flood hazard area is not supported by substantial evidence, as there has been no showing in the MND that HQTAs are all outside of the 100-year flood zone; the potential for impacts remains. Similarly the statement that development in accordance with the PSH Ordinance would result in no impacts related to the failure of a levee or dam or by inundation by seiche, tsunami, or mudflow is not supported by substantial evidence and the potential for impacts remains.*

Response 101-12

- a) All Mitigation Measures have been incorporated in the Proposed Ordinance as requirements that must be satisfied prior to approval of individual projects. Specifically, compliance with MM-HAZ-1 is required under Subparagraph 14.00 A.13(g)(13) of the Proposed Ordinance.
- b) Permanent supportive housing projects are unlikely to be developed in airport clear zones and accident potential zones, as the development of PSH under the Proposed Ordinance would only be allowed in areas of the City that are zoned for a multifamily residential use or in a PF Zone. Airports have an airport land use plan that provides guidance on land use in adjacent areas, and these generally do not allow for a residential use to be located in airport clear zones and accident potential zones. Furthermore, in 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project.
- c) While HQTAs encompass portions of the City that are located in Hillside Areas and a Very High Fire Hazard Severity Zone, development of PSH is only allowed in areas that are zoned to allow for a multifamily residential use. Only a few small portions of these areas would be eligible for the development of PSH under the Proposed Ordinance; however, development in these areas is not reasonably foreseeable as the majority of these sites are already developed and are unlikely to be used for PSH due to higher land costs in these areas. Additionally, as discussed on page IV-40 of the MND, development in accordance with the PSH Ordinance would be required to comply with building fire codes that minimize the risk of fire.
- d) Development in accordance with the PSH Ordinance would be required to comply with existing applicable federal, state and local floodplain regulations.

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis or review is needed related to impacts caused by hazards and hazardous materials.

Comment 101-13

Project impacts – noise:

- a) Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will compliance with the Regulatory Compliance Measures be enforced? Additionally, any Regulatory Compliance Measure that includes the out of technical infeasibility is moot, and therefore cannot be relied on to reduce potential impacts to less than significant.*
- b) How will Mitigation Measures MM-NOI-1 be enforced? As written the PSH Ordinance does not require compliance with this measure.*

Response 101-13

- a) The cited Regulatory Compliance Measures are legal requirements that apply to all development projects, regardless of the level of CEQA review that is completed. As discussed in a letter from Impact Sciences dated March 23, 2018 (provided as **attachment 'C'**), technically feasible measures has a defined meaning in the LAMC that is understood and has meaning to noise experts, and would include mufflers, sound barriers including noise walls/curtains along property lines and enclosures around individual pieces of equipment. These technically feasible measures are commonly used throughout the City and would be sufficient to reduce noise levels such that there would be a less than significant impact from PSH projects during construction.
- b) All Mitigation Measures have been incorporated in the Proposed Ordinance as requirements that must be satisfied prior to approval of individual projects. Specifically, compliance with MM-NOI-1 is required under Subparagraph 14.00 A.13(g)(13) of the Proposed Ordinance.

Comment 101-14

Project impacts – population and housing: The statement and assumption that the PSH Ordinance would not induce substantial population growth is not supported by substantial evidence. The PSH Ordinance and PSH construction in the City may result in population increases and these increases will involve additional in migration of homeless persons, a group largely dependent on publically funded housing. This must be addressed in the environmental document for the project.

According to the Los Angeles Homeless Services Authority (Homeless Authority), 12% of the homeless in the County (4,241 persons) have been here for less than one year. In addition, only approximately 70 percent of the area's homeless population lived in Los Angeles County before becoming homeless. It should also be noted that, according to the Homeless Authority, homelessness in Los Angeles County has increased 23% since 2016. The potential for population and housing impacts remains.

Response 101-14

See Response 100-6.

Comment 101-15

Project impacts – public services (police protection): In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency’s Research and Evaluation Unit in their review of housing studies found that larger projects may result in increased crime, and thus police services.

Response 101-15

See Response 100-3.

Comment 101-16

Project impacts – tribal cultural resources: Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-TCR-1 be enforced? As written the PSH Ordinance does not require compliance with this measure. The potential for impacts remains.

Response 101-16

All Mitigation Measures have been incorporated in the Proposed Ordinance as requirements that must be satisfied prior to approval of individual projects. Specifically, compliance with MM-TCR-1 is required under Subparagraph 14.00 A.13(g)(13) of the Proposed Ordinance.

Comment 101-17

Project impacts – public services: Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 2,000 units over 10 years, and PSH gap funding would provide for an additional 10,000 units, as part of the preparation of the environmental document for the Ordinance, the City should have consulted with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body. The MND does not demonstrate that the required consultation has taken place.

Response 101-17

See Response 100-5.

Comment 101-18

Mandatory findings of significance – cumulative impacts: The MND has not addressed the potential impacts of the additional 10,000 PSH units anticipated to be constructed as a result of Measure HHH in either its analysis of the proposed project, or in its cumulative impacts analysis. The City should prepare an environmental document that addresses the impact of all of its homeless housing production efforts. The MND has not provided sufficient statements to show that the PSH projects will not result in a contribution to impacts, which is cumulatively considerable.

Response 101-18

The City analyzed cumulative impacts in the MND. The Commenter has not provided any substantial evidence of a cumulative impact.

Comment 101-19

Indirect impacts – property values: The MND should address the fact that there is evidence, according to “The Impacts of Supportive Housing on Neighborhoods and Neighbors,” that PSH facilities may lead to a decrease in property values when located in higher income areas. The environmental document should address the potential environmental consequences of changes in property values and the potential for associated environmental deterioration.

Response 101-19

Property Values are a social/economic impact and are not an impact category that is analyzed under CEQA. In addition, the staff report prepared for the Proposed Ordinance provides evidence indicating that PSH does not have any negative impact on property values. This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis or review is needed related to indirect impacts on property values.

Comment 101-20

Growth inducing impacts: Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area or inhibit out-migration of homeless. The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

Response 101-20

This evidence is not relevant to the Proposed Project, and does not provide substantial evidence of a potential impact. See discussion in Response 100-6 for additional information.

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis is needed related to growth-inducing impacts.

LETTER NO. 102

March 6, 2018
Dean Wallraff
Advocates for the Environment
10211 Sunland Blvd.
Shadow Hills, CA 91040

Comment 102-1

Placing a large number of PSH facilities in a single neighborhood unduly burdens that neighborhood and raises environmental justice concerns. Most proposed and completed PSH projects are located in areas designated by the California Environmental Protection Agency as “disadvantaged communities” under SB 535.

Response 102-1

This comment does not raise evidence regarding potential CEQA impacts. The Proposed Ordinance is a citywide code amendment that will establish regulations to facilitate the development of supportive housing in locations throughout the City. Specifically, the PSH Ordinance would streamline the permitting process by creating an administrative clearance procedure, and is not modifying existing land use plans. The Comment provides no substantial evidence of an impact from the Project. No further analysis or review is necessary.

Comment 102-2

The PSH ordinance is inconsistent with the City’s General Plan – the Framework Element and the Community Plans – in many ways. It allows the construction of PSH facilities in areas with land-use designations inconsistent with those facilities and with the relaxed standards contained in the PSH ordinance. Before the PSH ordinance can be adopted by the City, the General Plan must be amended to be consistent with the ordinance, or the ordinance will be void when adopted (Leshar Communications, Inc. v. City of Walnut Creek (1990) 52 Cal.3d 531,541.)

Response 102-2

This comment does not raise evidence regarding potential CEQA impacts, and fails to provide specific information or details regarding how the Proposed Ordinance is inconsistent with the City’s General Plan. As discussed in the staff recommendation report (pages A-4 and A-5), the PSH Ordinance is enacted pursuant to State density bonus law, which requires local jurisdictions to provide development concessions to projects which provide a requisite amount of affordable housing. State density bonus law also authorizes the City to provide a density bonus greater than the minimum required by the State law (Government Code Section 65915(n)). Under State Law, the granting of this density bonus or additional incentives or concessions shall not require, or be interpreted in and of itself, to require a general plan amendment, local coastal plan amendment,

zoning change, or other discretionary approval (Government Code Sections 65915(f)(5) and 65915(j)(1)). The types of development concessions provided in the Proposed Ordinance are consistent with the City's authority under the State density bonus law, and largely reflect many of the existing incentives codified in the City's Zoning Code (LAMC Section 12.22 A.25).

Comment 102-3

The MND analysis assumes that 200 PSH units will be built each year for 10 years, and that another 1,000 PSH units/year may be built, based on Measure HHH funding (page II-5). But the MND fails to include cumulative-impacts analysis showing the effects of these 12,000 PSH units that could be built over the next 10 years.

Response 102-3

See Response 101-1.

Comment 102-4

The MND analysis fails to show that potential impacts related to aesthetics will be mitigated into insignificance by the mitigation measures in the MND. The MND dismisses potential nighttime glare from project lights, but adding hundreds of buildings, each with indoor and outdoor lighting, will add significantly to the area's light pollution. See https://en.wikipedia.org/wiki/Light_pollution

Response 102-4

The Proposed Ordinance includes a design standard in Paragraph 13(g)(10) requiring security night lighting to be shielded so that the light source cannot be seen from adjacent residential properties. This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis is needed related to impacts on aesthetics.

Comment 102-5

The MND's analysis (on page IV-6) says that each PSH project will likely be under the City's threshold, but the project enables the construction of thousands of such projects. The Project's cumulative air-quality impacts have not been adequately analyzed, given the potential for construction of 12,000 PSH units city-wide, and a great deal of other construction occurring in the City.

Response 102-5

As discussed in the Project Description, it is anticipated that the PSH Ordinance could result in up to 2,000 units over 10 years. Construction of these units are assumed to be spread approximately evenly over the period of ten years (200 per year). Table 6 on page IV-8 shows estimated anticipated construction emissions. Table 7 on page IV-9 shows anticipated operational emissions at the end of 10 years when all units are occupied. Neither construction emissions nor operational emissions associated with the 2,000 units that are anticipated to be constructed as a result of the proposed Project would exceed SCAQMD suggested thresholds. Since the proposed

Project would provide housing for people who are mostly already in the City, the net increase in operational emissions is not anticipated to be as high as the calculated emissions. In addition, the Project would result in development consistent with development assumption in the most recent RTP and AQMP and therefore would not substantially affect regional air quality.

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis or review is needed related to air quality impacts.

Comment 102-6

The MND's analysis shows that the Project's greenhouse gas (GHG) emissions may be on the order of 12,474 metric tons per year (Page IV-32). This is a large enough number to represent a significant impact, and the MND contains no analysis showing this amount would not be significant. It also indulges in improper CEQA piecemealing when it points out that most PSH projects would individually be exempt under SB 375 (Page IV-35). The MND is required to analyze the entire Project, and not break it up into individual pieces, then find their individual environmental effects insignificant.

Response 102-6

As discussed in the MND (page IV-27), there is no commonly-accepted quantitative threshold of significance by which to measure impacts related to GHG emissions. The MND provided analysis to demonstrate that the Proposed Ordinance is consistent with plans to address GHG emissions, including that the Project is consistent with the SCAG 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS).

The statements relating to SB 375, as referenced in this comment, were provided in the MND for informational purposes, and were not relied upon for the impact analysis conclusion. The fact that individual PSH projects developed as a result of the ordinance would likely be exempt under SB 375 further provides evidence that GHG emissions under the Proposed Project are consistent with state strategies for GHG reductions.

This comment fails to provide substantial evidence of a CEQA impact related to the proposed Project; therefore, no additional analysis or review is needed related to impacts on greenhouse gas emissions.

Comment 102-7

Many of the MND's discussions of environmental impacts, e.g. of Native-American cultural resources, assume that applicable regulations will mitigate the impacts to a level that is insignificant, but the MND in many cases fails to provide evidence or analysis supporting these assumptions.

Response 102-7

All Mitigation Measures have been incorporated in the Proposed Ordinance as requirements that must be satisfied prior to approval of individual projects. This comment offers no specific details

and fails to provide substantial evidence to demonstrate why the Mitigation Measures are inadequate or the identified regulatory compliance measures are not reasonably relied upon.

ATTACHMENT A

Letter from Supportive Housing Alliance dated March 9, 2018

RE: Average Size of Supportive Housing Development in Los Angeles

SUPPORTIVE HOUSING ALLIANCE

an advocacy group comprised of LA County supportive housing developers

March 9, 2018

Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012
Attn: Matthew Glesne and Cally Hardy
Sent via email

RE: Average Size of Supportive Housing Development in Los Angeles

Dear Mr. Glesne and Ms. Hardy,

We submit this letter in response to the Department of City Planning's analysis related to the pending Permanent Supportive Housing Ordinance.

The Supportive Housing Alliance is a network of twelve organizations in Los Angeles County that develop permanent supportive housing for formerly homeless individuals and families living with mental illness. Together, we have built over 6,000 units of permanent supportive housing (PSH). Our members are collectively preparing to greatly expand future PSH development to effectively implement Measure HHH, and would like to share our collective expertise in informing City policies related to PSH and HHH.

We believe the City's analysis that identified 75 units as the probable average development size for permanent supportive housing is supported by our work to date and planned development. While it might be advantageous in many ways to build larger developments, the size and cost of available land, zoning and community plan requirements, density limits, best practices in overall building sizes, and other characteristics that drive PSH development in Los Angeles make it very likely that 75 units will be the maximum average building size we can expect.

In an inventory recently released by the United Way of 130 existing permanent supportive housing developments within the City of Los Angeles, the average number of units per development is just 51. While this list is not 100 percent comprehensive, the majority of units not included were scattered site approaches and would not impact the average number of units calculated. This average of 51 includes many sites in Downtown Los Angeles, which allows for much greater density, and yet the average is still well below the City's estimate of 75. As there is also political momentum to ensure that all neighborhoods and Council Districts develop an appropriate share of housing, such as the recently announced 222 plan, we expect Downtown Los Angeles to continue to develop supportive housing units but also see much more development in lower density neighborhoods.

A Community of Friends	Clifford Beers Housing	Downtown Women's Center	Little Tokyo Service Center
LA Family Housing	Nancy Lewis & Associates	PATH Ventures	Skid Row Housing Trust
SRO Housing Corporation	Step Up on Second	Venice Community Housing Corp	W.O.R.K.S.

Almost 8,500 units completed to date, including 6,100 supportive housing units

SUPPORTIVE HOUSING ALLIANCE

an advocacy group comprised of LA County supportive housing developers

Mr. Glesne and Ms. Hardy
March 9, 2018
Page Two

While the average number of units per building to date is 51, we do expect that average to increase somewhat given recent policy shifts allowing greater density and streamlined approvals near transit, and the proposed PSH ordinance which creates similar incentives. For example, in the first round of Measure HHH funding for 615 units, the average development size was just over 68. However, if you remove Downtown projects, the average is reduced to 59.

In conclusion, we believe that our experience to date, historical and recent data on PSH development in the City of Los Angeles, and neighborhood, land use and cost characteristics unique to the City of Los Angeles all support that the average project size of 75 analyzed by the City for the PSH ordinance is a reasonable and justifiable assumption.

Please contact us with any questions or for additional data.

Sincerely,

Dora Gallo, A Community of Friends
Cristian Ahumada, Clifford Beers Housing
Anne Miskey, Downtown Women's Center
Neil McGuffin, Little Tokyo Service Center
Stephanie Klasky-Gamer, LA Family Housing
Nancy Lewis, Nancy Lewis and Associates
Amy Anderson, PATH Ventures
Mike Alvidrez, Skid Row Housing Trust
Anita Nelson, SRO Housing Corporation
Tod Lipka, Step Up on Second
Becky Dennison, Venice Community Housing
Channa Grace, W.O.R.K.S.

A Community of Friends	Clifford Beers Housing	Downtown Women's Center	Little Tokyo Service Center
LA Family Housing	Nancy Lewis & Associates	PATH Ventures	Skid Row Housing Trust
SRO Housing Corporation	Step Up on Second	Venice Community Housing Corp	W.O.R.K.S.

Almost 8,500 units completed to date, including 6,100 supportive housing units

ATTACHMENT B

Letter from PATH Ventures dated March 9, 2018

RE: Average Size of Supportive Housing Developments



340 North Madison Ave.
Los Angeles, CA 90004
(323) 644-2209
www.PATHVentures.org

March 9, 2018

Matt Glesne
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012
Attn: Cally Hardy

RE: Average Size of Supportive Housing Developments

Dear Mr. Glesne,

PATH Ventures respectfully submits to you the enclosed feedback with regard to the historic and anticipated size of its supportive housing developments.

PATH Ventures (PV) is a recognized leader in creating high-quality, affordable and stable homes for people struggling with the high cost of housing in California, particularly families and individuals experiencing homelessness. We advance our mission of ending homelessness for individuals, families and communities by developing and operating affordable rental homes paired with on-site services that support residents in regaining long-term stability, independence, and health. Across the state, PV has over 1,100 units in operation, under construction or in predevelopment.

In reviewing our portfolio and pipeline of projects, we calculated the average size of both our operating and future developments in Los Angeles to be 60 units per project (out of 16 total projects). The average size of our operating properties is just under 57 units; the average size of projects under construction or in predevelopment is just over 65 units.

While we expect the PSH Ordinance will allow for some increase in project size, we anticipate that the more meaningful benefit of the Ordinance will be the ministerial review process. Project size will continue to be constrained by:

- A limited supply of large re/development sites and their high cost;
- Challenges (cost, time, effort) in consolidating smaller parcels into larger development sites; and,
- Higher construction costs for taller buildings, due to a change in construction type.

Operationally, PV also finds that moderately sized buildings offer a more successful environment for tenants who historically have struggled with housing stability. It allows for sufficient case management staffing (and office space for this staff), a high-quality living environment that emphasizes indoor and outdoor common spaces, and a setting in which it is easier to build community and maintain respect for neighbors.

To: Matt Glesne
Re: Average Size of Supportive Housing Developments
March 9, 2018
Page 2

We appreciate this opportunity to provide you information about our experience in building and operating supportive housing. Please contact us with any questions or for additional data.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amy N. Anderson", with a long horizontal flourish extending to the right.

Amy N. Anderson
Executive Director

ATTACHMENT C

Letters from Impact Sciences dated February 21, 2018 and March 23, 2018

RE: Permanent Supportive Housing Ordinance Comments on Mitigated Negative Declaration



28 North Marengo Avenue
Pasadena, California 91101
(626) 564-1500
www.impactsciences.com

1988 | 30 | 2018

February 21, 2018

City of Los Angeles
Department of City Planning, Housing Unit
200 N. Spring Street, Room 278
Los Angeles, CA 90012

Attn: Ms. Cally Hardy

Re: Permanent Supportive Housing Ordinance Comments on Mitigated Negative Declaration

Dear Ms. Hardy:

We have reviewed the comments on the PSH Ordinance submitted by Channel Law Group, LLP, dated February 12, 2018. In particular, the comment indicated the MND includes "flawed project assumptions" regarding the size of PSH projects (p. 12). As stated in the MND, it is assumed that most PSH projects would contain approximately 75 units. This is based on existing data on PSH projects as described in the MND. However, it is possible that some PSH projects could contain up to 120 units (200 units in downtown). Whether the projects contain 75 units or 200 units would not materially change the air quality analysis presented in the MND. In particular, PSH projects generally contain fewer residents (generally they are single units) than typical multifamily projects. These projects are required to be located in areas well served by transit (high quality transit areas) and in general they generate fewer vehicle trips than typical multifamily units because of their location near transit and because PSH populations have low car ownership rates. In addition, the projects are anticipated to have limited soil export during construction due to the lower parking requirements. Soil export is generally required for underground parking and very few if any of these projects would require such parking as a) parking rates are low and b) subsurface parking is much more expensive than above ground parking.

Based on our professional experience conducting air quality modeling for hundreds of projects, and in consideration of the factors identified above, it is our opinion that the

Ms. Cally Hardy
February 21, 2018
Page 2

analysis would not materially change whether an individual PSH project contains 75, 120 or 200 units in the Downtown area.

Sincerely,
Impact Sciences, Inc.

A handwritten signature in black ink that reads "Jared Jerome". The script is fluid and cursive, with the first letters of "Jared" and "Jerome" being capitalized and prominent.

Jared Jerome
Technical Specialist



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March 23, 2018

City of Los Angeles
Department of City Planning, Housing Unit
200 N. Spring Street, Room 278
Los Angeles, CA 90012

Attn: Ms. Cally Hardy

Re: Permanent Supportive Housing Ordinance Comments on Mitigated Negative Declaration

Dear Ms. Hardy:

We have reviewed the comments on the PSH Ordinance submitted by Channel Law Group LLP; in particular, the comment on page 19 regarding mitigation measure RCM-NOI-2.

RCM-NOI-2 states that (emphasis added): “LAMC Sections 111.0 through 116.01 require that construction noise greater than 75 dBA at 50 feet is prohibited between the hours of 7 am and 10 pm within 500 feet of a residential zone unless compliance is technically infeasible.” In the February 12, 2018 letter, the Channel Law Group argues in relation to the above language, that “[a]ny measure that includes the out of technical infeasibility is moot, and therefore cannot be relied on to reduce potential impacts to less than significant.”

Under the City’s Noise Ordinance, specifically the provisions identified above, “technical infeasible” is expressly defined and as it is defined would ensure, along with the other measures, that the proposed project would result in less than significant impacts. Specifically LAMC Section 112.05 provides:

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically

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infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Based upon the above definition, technically feasible measures, have a clear meaning to noise experts. These measures are commonly available and used in construction projects in the City, and elsewhere, and would include but are not limited to, mufflers, sound barriers including noise walls/curtains along property lines, and enclosures around individual pieces of equipment. These measures are well known to noise consultants and construction contractors. Using these measures would foreseeably avoid significant noise impacts from the type of construction projects that would occur under the proposed ordinance.

Sincerely,
Impact Sciences, Inc.

A handwritten signature in cursive script that reads "Jared Jerome".

Jared Jerome
Technical Specialist