CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
221 NORTH FIGUEROA ST. SUITE 1350, LOS ANGELES, CA 90012

SUSTAINABLE COMMUNITIES PROJECT CEQA EXEMPTION

942 North Broadway Project

Environmental Case: ENV-2018-3238-EAF

Project Location: 942 North Broadway, Los Angeles, CA 90012

Community Plan Area: Central City North

Council District: 1—Gilbert A. Cedillo

Project Description: The Project Site is located at 942 North Broadway within the Central City North Community Plan area within the City of Los Angeles. The Project Site currently includes a two story multi-tenant commercial building that includes retail, restaurant, and office uses as well as related surface parking. The General Plan designation for the Project Site is Regional Commercial. The Project Site is zoned C2-2 with a small portion at the rear of the property (approximately 206 square feet) zoned [Q]C2-2.

The Project would remove the existing two story multi-tenant commercial building and would construct an approximately 211,725 square foot mixed-use building that would include 178 mixed-income residential units (including nine affordable to very low income households) and approximately 36,814 square feet of commercial and office space. The Project would be 27 stories with a maximum height of 291 feet 5 inches above grade. Parking would be provided in five levels of subterranean parking with approximately 217 spaces dedicated to residential parking and 51 spaces provided for commercial and office uses. The Project would also include 245 bicycle parking spaces. Office space would be provided at the rear of the building on the ground floor and throughout levels 1 to 4. Residential amenity space would be provided on levels 4 and 6 and on the rooftop, and residential units would be provided on levels 6 to 24. Mechanical services and a machine room are proposed to be located on levels 26 and 27. A ground floor plaza would be located at the north end of the Project Site along North Broadway.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
ESA

APPLICANT:
TF Broadway LP

January 2019

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January 2019

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1.0 Project Description

The Project Site is located at 942 North Broadway, in the Chinatown neighborhood in the City of Los Angeles. The Project Site currently includes a two-story multi-tenant commercial building that includes retail, restaurant, and office uses as well as related surface parking. The Project Site is bounded to the west by North Broadway, to the south by the recently constructed five-story Blossom Plaza mixed-use residential development, and commercial uses and surface parking to the north. East of the Project Site, is the industrial building formally occupied by the Capitol Milling Company, a historical resource, which is now being redeveloped into a mixed use development which will include a brewery, restaurant, and office uses. Across North Broadway to the west is the Chinatown East Gate, a designated a historical resource.

The Project is located within the Central City North Community Plan area within the City of Los Angeles. The Central City North Community Plan designates the Project Site for Regional Commercial land uses. The Project Site is zoned C2-2 with a small portion at the rear of the property (approximately 206 square feet) zoned [Q]C2-2. The Project would remove the existing two-story multi-tenant commercial building and would construct an approximately 211,725 square-foot mixed-use building that would include 178 mixed-income residential units (including nine units affordable to very low income households) and approximately 36,814 square feet of commercial and office space. The Project would be 27 stories with a maximum height of 291 feet 5 inches above grade. Parking would be provided in five levels of subterranean parking with approximately 217 spaces dedicated to residential parking and 51 spaces provided for commercial and office uses. The Project would also include 245 bicycle parking spaces. The Project would provide neighborhood serving commercial uses and residential lobby uses that would front North Broadway and would serve to activate the street front. Office space would be provided at the rear of the building on the ground floor and throughout levels 1 to 4. Residential amenity space would be provided on levels 4 and 6 and on the rooftop, and residential units would be provided on levels 6 to 24. Mechanical services and a machine room are proposed to be located on levels 26 and 27.

A ground floor plaza would be located at the north end of the Project Site along North Broadway adjacent to the existing crosswalk (which would be widened) which connects the Project Site to the Chinatown East Gate. The ground floor plaza would include outdoor seating, landscaping, and a water feature. The ground floor plaza would provide a visual and physical link to the surrounding pedestrian streetscape as well as the nearby Chinatown East Gate.

2.0 Sustainable Communities Strategy Criteria

I. SUSTAINABLE COMMUNITIES STRATEGY CRITERIA		
	Yes	No
Is the proposed project consistent with the general land use designation, density, building intensity, and applicable policies specified for the project area in an adopted Sustainable Community Strategy? The Project is consistent with the general land use designation, density, and building intensity outlined in the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 place types, and then classified sub-regions into one of three land use development categories: 'Urban,' 'Compact,' or 'Standard.' SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.[1] It should be noted that the statutory requirement is that a project achieve "general" rather than absolute or perfect consistency with the SCAG 2016 RTP/SCS land use designation, density and building intensity projections. After converting this data into Scenario Planning Zone-level place types, SCAG categorized the area surrounding the Project as 'Urban' for both 2012 and 2040. The RTP/SCS defines the 'Urban' areas as often found within and directly adjacent to moderate and high density urban centers. The most intense development types are anticipated in the 'Urban' Land Use Development Category, as compared to 'Compact' and 'Standard,' and is therefore the appropriate Land Use Development Category to accommodate the most intense development types. According to the RTP/SCS, nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multi-family and attached single-family (townhome), which tend to consume less water and energy than the large types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.[2] The 'Urban' Land Use Development Category comprises the following urban footprint scenario models, including urban mixed use, urban residential, urban commercial, city mixed use, city residential, and city commercial.[3] The Project Site would be consistent with the City Mixed-Use area and City Residential place types within the Urban Land Use Development Category, as described further below: • City Mixed-Use areas are transit oriented and walkable, and contain a variety of uses and building types. Typical buildings are between 5 and 30 stories tall, with ground-floor retail space, and offices and/or residential on the floors above. Parking is	X	

1 SCAG, 2016 RT/SCS, Page 20-21, available at: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx, 2016, accessed July 18, 2018.

2 SCAG, 2016-2040 RTP/SCS, Page 20, available at: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx, 2016, Accessed July 18, 2018

3 SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 9, available at: http://www.scagrtpscs.net/Documents/2016/supplemental/LDC_PlaceType.pdf, 2016; SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 6, available at: http://scagrtpscs.net/documents/2016/supplemental/ UrbanFootprint_PlaceTypesSummary.pdf, 2016. Accessed July 18, 2018

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

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

The location of the Project is consistent with the City Mixed-Use area and City Residential place type as described above. The Project Site is located in an active urban area surrounded by a diverse mix of land uses including, commercial, residential, entertainment, and office development. Immediately to the south of the Project Site is the five-story Blossom Plaza mixed-use residential project. To the north, are a variety of commercial uses including restaurants, retail shops, commercial offices, and art galleries. East of the Project Site, is the industrial building formally occupied by the Capitol Milling Company, which is now being redeveloped into a mixed use development which will include a brewery, restaurant, and office uses. The Project Site is located in transit-rich and walkable area with connectivity to many areas within the City.

The Project's scale would be consistent with the City Mixed-Use area and City Residential place type as it would develop a Project up to 27 stories in height that would include residential, ground floor commercial, office, and subterranean parking in the highly-urbanized Chinatown neighborhood in the City of Los Angeles. The Project is located in a major metropolitan area that is well served by regional and local transit, as well as other modes of transportation. Local access is provided by North Broadway and College Street. Regional access is provided by the Arroyo Seco Parkway (SR 110), located approximately 620 feet to the northwest and the Hollywood Freeway (US 101) located approximately 0.7 miles to the south. The Project Site is served by a variety of transit options including numerous Metro and LADOT DASH bus lines. The Project Site is less than 400 feet from the Metro Gold Line Chinatown Rail Station.

The Project is located in a dense urban area, and would be a greater intensity than the amount that currently exists on the Project Site. As shown in Table 1, *Proposed Land Use*, below, the Project would have a total floor area of 211,725 sf that would consist of approximately 83 percent residential uses and 17 percent non-residential uses. The Project's residential component is comprised of a total of 178 multi-family units and would set aside six percent of the total units (nine affordable units) to families of very low income.

The Project is a mixed-use infill development that would include residential, office, and commercial uses on-site and is located within walking and bicycling distance of a variety of retail, restaurant, employment, and services uses, as well as numerous transit opportunities; therefore, Project would provide opportunities for residents and visitors to use

[4] SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 6, 2016, Accessed July 21, 2018

[5] SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 6, 2016, Accessed July 21, 2018.

public transit for work trips, and walk and bicycle to services and businesses near the Project area. Additionally, the Project's increase in density provides a foundation for the implementation of other strategies, such as enhanced transit services, by facilitating the use of transit by more people, which in turn results in more funds for improvements and enhancements. Thus, the Project would encourage the utilization of public transit as a mode of transportation to and from the Project area and contribute to the productivity and use of the regional transportation system by providing housing and jobs near public transit. Furthermore, the Project would enhance the pedestrian environment near and on the Project Site. A ground floor with outdoor seating is proposed at the north end of the Project Site adjacent which would physically and visually connect the Project Site to the East Chinatown Gate. The proposed 5,037 square feet of commercial uses along the ground-level streetscape would also help to activate pedestrian activity in the surrounding area.

Table 1 below shows the proposed land uses, units/sf, FAR, and percentage of use for each site.

Table 1: Proposed Land Use

Land Use	Units/Square Feet	Percentage of Use
Residential	178 units (9 affordable) 174,911 sf	82.6%
Commercial	5,037 sf	2.3%
Office	31,177 sf	14.7%
Combined	211,725 sf	100%
FAR	7.35:1	

As described below, the Project would be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and designed to achieve at least 25 percent less water usage than the average household use in the region. The Project would achieve its energy efficiency through the implementation of multiple measures including, but not limited to, overhanging balconies for solar shading, high performance windows, daylighting controls and other forms of high-efficiency lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems, and centralized hot water system and high-efficiency water fixtures. The Project would achieve its water efficiency through multiple measures including high efficiency water using appliances such, low flow fixtures and faucets water saving pool features, water efficient irrigation systems, and drought tolerant landscaping (Attachment C, *Energy and Water Efficiency Compliance Report*).

Therefore, the Project is consistent with the 'Urban' Land Use Development Category, the urban land use designation, as well as the associated land use density and building intensity assumptions in the RTP/SCS.

The Project is also consistent with the goals and policies in the RTP/SCS, as outlined in Section 3.0, *Project Consistency with the Goals and Benefits of the 2016-2040 RTP/SCS*.

If answered "No" to the above question, the project does not qualify for CEQA Exemption or Streamlining under the Sustainable Communities Strategy.

I. TRANSIT PRIORITY PROJECT DEFINITION CRITERIA **To meet the definition of a Transit Priority Project (TPP), as defined by Public Resource Code (PRC) Section 21155(b), the proposed project must meet all of the following criteria:**	Yes	No
Based on total building square footage, the proposed project contains at least 50 percent residential use.	X	
The Project would construct a mixed-use building comprised of three levels of office space, one level commercial uses, and 19 levels of residential uses with a total floor area of 211,725 square feet. The Project would consist of 178 residential units, totaling approximately 174,911 square feet of residential uses and 36,814 square feet of non-residential uses. Therefore, the Project contains approximately 83 percent residential uses, which is greater than 50 percent. **And, if project contains between 26 percent and 50 percent of non-residential uses, would the Floor Area Ratio be greater than 0.75?** This criterion is not applicable. The Project contains approximately 17 percent non-residential uses.	X	
Would the proposed project include a minimum net density of at least 20 dwelling units per acre? The Project Site maintains a pre-dedicated lot area of approximately 29,575 sf. The Project is requesting to merge 7 feet of an existing 10 feet dedication along North Broadway and that would result in a combined lot area of 28,806 sf or 0.66 acres. Therefore, the Project would provide 178 dwelling units at a density of 270 dwelling units per acre.	X	
Is the project site located within one-half mile of either of the following which have been included in a Regional Transportation Plan (RTP)? **(a) a major transit stop that contains an existing rail station, a ferry terminal served by transit, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during peak commute periods (also includes major transit stops that are included in the applicable RTP); or,** **(b) a high quality transit corridor that has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.** The Project Site is approximately located less than 400 feet (0.07 miles) north of the Metro Rail Gold Line Chinatown light rail station, a Major Transit Stop. SCAG has identified the Project Site as a high quality transit area and transit priority area (Attachment B, *High Quality Transit Area and Transit Priority Area Maps)*. Therefore, the Project Site satisfies the CEQA exemption transit proximity requirement by being within a ½ mile of a light rail station and is not required to further demonstrate proximity to intersecting bus routes or high quality transit corridors that provide bus service intervals of 15 min or less. Nevertheless, the Project is located in proximity to multiple bus stops with high frequency transit service. The Project Site is serviced by nearby transit lines including DASH Downtown, DASH Lincoln Heights/Chinatown, and regular Metro lines 28, 45, and 83. The Project Site is also located approximately 0.12 miles from the Hill and College Streets bus stop which is serviced by Metro Rapid 794 and regular Metro lines 81, 90/91, 94, and 96. While these locations do not provide intersecting bus routes with 15 minute headways or less in the peak hours, with many bus lines serving the Project Site, the Project Site is well served by bus transit access.	X	

In addition, the City of Los Angeles has identified the Project Site as within a transit priority area. A transit priority area is an area within one-half mile of a major transit stop that is existing or planned. (Attachment I: *Zoning Information*).		
If answered "No" to any of the above questions, the project does not meet the definition of a Transit Priority Project and does not qualify for a full CEQA exemption under PRC Section 21155.1.		
II. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
To be considered a Sustainable Communities Project, the Transit Priority Project (TPP) must comply with all of the following environmental criteria, as defined by PRC Section 21155.1(a).		
	YES	NO
(1) The TPP is adequately served by existing utilities and the project sponsor has paid, or has committed to pay, all applicable development fees. The Project Site is already served by existing utilities and the Project can be adequately served by existing utilities. As noted in Attachment L, *Los Angeles Department of Transportation Technical Memorandum and Traffic Report* in correspondence dated July 28, 2018, the Los Angeles Department of Water and Power (LADWP) indicated that water service could be provided to the Project. The Project Applicant will pay all applicable development fees. Water service infrastructure that serves the Project Site are owned and maintained by the LADWP. Existing water mains include a 24-inch main line along North Broadway. One existing fire hydrant is located immediately adjacent to the Project Site at the northwestern corner. The existing public sanitary sewer main lines near the Project Site are owned and maintained by the City of Los Angeles Sanitation Department. The nearest sanitary main line to the Project Site is a 15-inch vitrified clay pipe (VCP) along North Broadway that runs south toward College Street. Construction of the Project would include all necessary connections to adequately link the Project to the existing City water and sewer system. The proposed sizes and locations for the domestic water and fire water points of connection will be determined by the LADWP and City of Los Angeles Fire Department, respectively. As described earlier, Project would be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and be designed to achieve at least 25 percent less water usage than the average household use in the region. Due to the largely impervious existing Project Site conditions and the increase in the amount of landscaping and other pervious surfaces, the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity. The Project would be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standards.	X	
(2) The TPP site does not contain wetlands or riparian areas, does not have significant value as a wildlife habitat, and implementation of the project would not harm protected species. The Project Site is currently fully developed. There are no wetlands or water features present at the Project Site as defined by Section 404 of the Clean Water Act. No impact would occur with regard to federally protected wetlands. Further, no riparian habitat or other sensitive natural communities are located on or adjacent to the Project Site. The Project Site is located in an urbanized area within the Chinatown community of the City of Los Angeles, primarily surrounded by commercial, retail, institutional, and residential land uses, and is currently occupied by commercial uses and a parking lot. As stated in the Tree Report prepared by Carlsberg Associates in May 2018 (Attachment G, *Tree Report*), there are two trees (Indian Laurel and Chinese Flame) on the northeast portion of the Project Site and one tree in the City right-of-way (Hong Kong Orchard) along	X	

North Broadway. These trees would be removed and replaced during construction of the Project. There are no protected trees within the property lines of the Project Site or on the City right-of-way. Trees that are designated as "protected trees" as defined by Section 17.02 of the Los Angeles Municipal Code include oak trees (Quercus spp.), southern California black walnuts (Juglans californica), western sycamores (Platanus racemosa), and California bay laurels (Umbellularia californica), that have a trunk diameter at breast height (dbh) of at least four inches. Furthermore, the Project would provide 45 new on site trees, a net increase of 43 trees on site, providing a substantial increase of potential habitat area on the Project Site. It is City's policy to retain or replace any street trees removed during project development. Specifically, the City's policy is to replace all significant, non-protected trees (8 inch or greater or cumulative trunk diameter if multi-trunked, as measured 54 inches above ground) at a 2:1 ratio with a minimum of 24-inch box tree. Further, per the City's Street Tree policies, the City Department of Public Works' Urban Forestry Division's policy is to replace street trees removed during the construction of a project. Therefore, any street trees that would be removed as part of the Project would be replaced in accordance with the City's policies. The final number and location of street trees would be determined in consultation with the City's Urban Forestry Division. The existing three trees could contain nests for migratory birds, which are protected under the Migratory Bird Treaty Act, or the MBTA Section 3503, 3503.5, and 3513 of the California Fish and Game Code. The MBTA prohibits take of all birds and their active nests, including raptors and other migratory nongame birds. The Project is required to adhere to the MBTA and applicable federal and state laws as well as the California Fish and Game Code; as a result, the Project would not have any substantial adverse impact, directly or through habitat modifications, on any protected species.		
(3) The TPP site is not located on any list of hazardous waste sites compiled pursuant to Section 65962.25 of Government Code (Cortese List). Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control Board's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board. A Phase I Environmental Site Assessment (ESA) was prepared by Cardno ATC in September 8, 2015 (Attachment E, *Environmental Assessments*). As part of the Phase I ESA, a search was conducted for available federal, state, and local environmental database records for the Project Site and where practicable, adjoining properties and nearby properties or surrounding areas within approximate minimum search distances from the Project Site. The Phase I ESA indicates that there are no cleanup sites (either Federal	X	

Superfund, State Response, State or Tribal Clean up, voluntary, school evaluation, tribal, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in, or under the Project Site. The Phase I ESA notes that a company formerly located at on the Project Site ("Nice Image") was on a database search of the HAZNET database, as it potentially generated manifested waste 20 years ago in 1998. The manifest(s) indicate the wastes generated were reported as photochemicals or photo processing waste. The Phase I concludes that "HAZNET does not track violators and the presence of a facility on this database does not necessarily indicate that a problem exists at that facility. Based on the nature of the wastes generated, the HAZNET listing is not considered to represent an environmental concern to the property." The Cortese List is compiled from several sources, which include, without limitation, underground storage tank cleanup sites, solid waste disposal sites, and sites that are subject to various types of regulatory cleanups. (Gov't Code Sec. 65962.5.) Being listed on the HAZNET database for having generated potentially manifested waste at the facility does not qualify the Site for being on the Cortese List, nor does it indicate standing alone that any hazardous materials releases occurred at the Project Site. Quite the opposite; the fact that the waste was manifested provides some indication that it was transported from the Project Site in accordance with legal requirements. Accordingly, the Project Site is not located on any list of hazardous waste sites compiled pursuant to Section 65962.25 of Government Code (Cortese List).		
(4) The TPP is subject to a preliminary endangerment assessment to determine the existence of any hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from the area. **(a) If a release of a hazardous substance is found to exist on the site, the release shall be removed or any significant effects of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements;** **(b) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with state and federal requirements.** A preliminary endangerment assessment (PEA) for the Project was prepared by HMC on July 19, 2018 (Attachment E, *Environmental Assessments*). Consistent with the requirements of California Public Resources Code section 21155.1(a)(4), the PEA was completed to assess whether any Project Site contaminants would be a significant health hazard to future resident and workers and temporary construction workers. The Project Site and surrounding properties were historically used by Baker Iron Works, a foundry, from the late-1880s to the 1920s. Based on investigations completed at the Project Site, there were two potential sources of risk to investigate in the PEA. Lead has been detected in the shallow soil at concentrations that exceed regulatory screening levels for protection of human health. Volatile organic compounds (VOCs) and heavy petroleum hydrocarbons may be present in groundwater beneath the Project Site as a result of off-site releases and regional groundwater issues. Off-gassing from residual groundwater impacts could theoretically be a source of VOCs in soil gas at concentrations that exceed regulatory screening levels for potential vapor intrusion. Although methane concentration detected at the Project Site did not indicate an explosion hazard, based on the Project Site's location within the City of Los Angeles Methane Zone, the Project would be subject to developmental regulations pertaining to ventilation and	X	

methane gas detection systems that are mandated by the City of Los Angeles. Development would occur per the provisions of the City of Los Angeles Building Code, Chapter 71 Methane Mitigation Standards Ordinance. This ordinance provides information describing the installation procedures, design parameters and test protocols for methane gas mitigation systems. More specifically, the Methane Mitigation Standards ordinance defines requirements for site testing, methane mitigation systems, and ventilation systems. Compliance with City requirements would ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment.

The PEA evaluated possible ingestion, inhalation, and dermal exposure routes of the contaminants at the Project Site to possible human receptors which included future residents, and occupational and construction workers. The results of the PEA are discussed below:

Operation Risks: The Project would include a five-level subterranean parking garage and the surface of the Project Site would largely be capped by the building and paved walkways. In addition, shallow soil would be excavated and disposed of off-site during construction of the Project. As such, exposure to contaminated soils to future residents and workers at the Project Site during operation of the Project would be limited.

As part of the LADBS requirement for construction in the City of Los Angeles Methane Zone, the building would be constructed with a methane barrier. The bottom of the mat slab would also be sloped 1 percent. This, along with the methane barrier, would allow potential methane and vapors to move outside the building limits and minimize potential vapor intrusion into the building. Based on the construction of a subterranean parking garage, potential vapor intrusion to future occupational workers, residents, or visitors on the Project Site would also be limited. Groundwater would not be used on-site or as a source for drinking water; therefore, future residents and occupational workers would not be exposed to the impacted groundwater beneath the Project Site.

As such, there is a low likelihood that a significant health risk is present to future residents and occupational workers as a result of residual soil, soil vapor, and groundwater impacts. Notwithstanding the requirement for a vapor barrier system, as precautionary measure, the PEA include a Human Health Risk Assessment (HHRA) to assess potential vapor intrusion risks to the first floor commercial uses as a result of the VOCs previously detected at the Project Site. As stated in the PEA, as three floors of retail and office space is present beneath the residential floors, future residents would not be exposed to potential soil vapors Based on the results of the HHRA, health risk values for future occupational workers did not exceed the risk levels. As such potential risk to residents, visitors and employees during operation of the Project would be minimal.

Construction Related Risks:

The PEA indicated that there is a potential risk to construction workers that may be exposed to soil contamination and petroleum impacted groundwater during excavation and construction of the subterranean parking garage. Following excavation of the shallow soil to less than 10 feet bgs, health risks associated with lead impacts would be significantly minimized. Furthermore, groundwater would be dewatered during construction, thereby minimizing groundwater exposure to construction workers.

While risks to construction workers would be minimal, the Project would include a Project Commitment for the preparation and enforcement of a Soil Management Plan (SMP) and a Groundwater Management Plan (GWMP). The SMP would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or

impacted soils that may be encountered at the Project Site during grading and excavation activities. The GWMP would include training and protocols for contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking. The Project Commitment for the SMP and GWMP would be included in the Project Plans and as conditions of approval. As such, potential risks to construction workers during construction of the Project would be minimal.		
(5) The TPP would not have a significant impact on historical resources. A Historic Resources Technical Report prepared by GPA Consulting for the Project in April 2018 (Attachment H: *Historic Report Memo and Historic Resource Technical Report*) determined that the existing multi-tenant commercial building on the Project Site constructed between 1985 and 1986, is not currently listed, nor is eligible to be listed, under national, state, or local landmark or historic district programs. The building is also not included as significant in any historic resource surveys of the area. As the existing building on the Project Site that would be removed is not a historical resource, the Project would have no direct impacts on historical resources related to the built environment. The Historic Resources Technical Report indicated that there are 19 listed and potential historical resources in the study area and determined that the Project would have a less-than-significant indirect impact on the identified 19 historical resources. While the Project would introduce a new visual element to the immediate surroundings of the historical resources in the study area, the Project would not result in a substantial adverse change to the integrity of these historical resources to the degree that they would no longer be eligible for listing as historical resources defined by CEQA. Indirect impacts to historic resources related to the built environment would be less than significant. Pursuant to CEQA Guidelines Section 15064.5 a Cultural Resources Assessment Report was prepared by ESA in October 2018 (Attachment H, *Historic Report Memo and Historic Resource Technical Report*), which also satisfies the requirements set forth in SCAG MM-CUL-2(b), to identify if previously evaluated or previously unknown historical resources, including archaeological or tribal cultural resources. The Cultural Resources Assessment determined that one historical resource, the *Zanja Madre*, bisects the northeast corner of what is presently the Project Site. For the purposes of this Project, the City of Los Angeles is treating the *Zanja Madre* as a "historical resource" under CEQA Guidelines Section 15064.5(a)(3). In addition, the outreach to the NAHC indicated positive results from the Sacred Lands File search. Consultation with tribal representatives provide by the NAHC indicated that the *Zanja Madre* is included in the Sacred Lands File and the Project Site is sensitive due to the close proximity of prehistoric and historic Native American villages to the Project Site as well as known Native American burial sites in the vicinity of the Project. In furtherance of SCAG MM-CUL-2 (b), a Project Commitment would be included as part of the Project and as a condition of approval. In order to avoid impacts to the Zanja Madre, a historical resource, the Project has been designed to include a permanent setback area, both horizontally and vertically, around the mapped and possibly preserved in place Zanja segment that may be located on the northeast corner of the Project Site. The permanent setback area includes a 5-foot buffer on each side of the conduit as it is mapped on an 1890 LADWP as-built drawing of the Project Site. The mapped location of the permanent setback area is included in the Project plans and design drawings. Therefore, the Project would not have a significant impact to historic resources.	X	

(6) The TPP is not subject to any of the following: **a. a wildland fire hazard;** **b. an unusually high risk of fire or explosion from materials stored or used on nearby properties;** **c. risk of a public health exposure at a level that would exceed federal and state standards;** **d. seismic risk as a result of being within a designated earthquake fault zone or seismic hazard zone; and** **e. landslide hazard, flood plain, flood way, or restricted zone.** a) The Project Site would not be subject to a wildland fire hazard. The Project Site is located in the highly urbanized area. The Project Site is not located within a Very High Fire Hazard Severity Zone or designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element. b) The Phase I ESA (Attachment E, *Environmental Assessments*) prepared for the Project found that the Project Site is not included in any federal, state, or local environmental list that identifies the use, generation, storage, treatment or disposal of hazardous materials and chemicals, or release incidents of such materials that may impact the Project Site. The Project Site is not subject to an unusually high risk of fire or explosion from materials stored or used on nearby properties. c) The Project Site is not located on any list of hazardous waste sites compiled pursuant to Section 65962.25 of Government Code (Cortese List). Based on the Project Site's location within the City of Los Angeles Methane Zone, the Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City of Los Angeles. Compliance with City requirements would ensure that the Project would not result in a risk of a public health exposure at a level that would exceed local standards. While risks to construction workers would be minimal, the Project would include Project Commitments and conditions of approval for the preparation and enforcement of a Soil Management Plan (SMP) and a Groundwater Management Plan (GWMP). The SMP would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. The GWMP would include training and protocols for contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking. Implementation of the GWMP and SMP as part of the Project would ensure that any impacts on construction workers would be reduced to a level of insignificance in compliance with federal, state and local requirements. As indicated in the Phase I ESA (Attachment E, *Environmental Assessments*) given the age of the on-site structures (1986) it is unlikely that Asbestos Containing Materials (ACMs) are present in significant quantities. However, the Phase I ESA recommended that prior to any renovation or demolition activities, an asbestos survey be conducted. Based on the age of the on-site building, it is unlikely that lead based paint (LBP) has been used on the existing structures	X	

to be demolished. However, given that lead may be present in other materials within the existing on-site buildings such as ceramic tile and fixtures, prior to any renovation or demolition activity, the Phase I ESA recommended that a lead survey should be conducted of any suspect lead-containing materials (including paint) within the existing building that are likely to be disturbed.

To further minimize risks associated with ACMs, a Project Commitment would be implemented as part of the Project that would require that prior to demolition activities, an investigation for ACMs would be conducted and identified asbestos shall be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations.

In addition, a Project Commitment would be implemented and included as a condition of approval as part of the Project that would require that prior to demolition activities, an investigation for LBP would be conducted and any identified LBP would be abated in accordance with applicable City, State, and federal regulations.

A Freeway Health Risk Assessment (HRA) was prepared for the Project (Attachment D, *Freeway Health Risk Assessment*). In 2012, the City of Los Angeles Planning Commission issued Zoning Information No. 2427, Freeway Adjacent Advisory Notice for Sensitive Uses, regarding the need to consider the public health implications of certain freeway-adjacent projects. The Advisory Notice recommends projects that place sensitive receptors in proximity (within 1,000 feet) to a freeway prepare a Freeway HRA. The Advisory Notice is informational in nature and does not impose any additional land use or zoning regulations; it is not a prohibition on development near freeways. As SR-110 is located approximately 620 feet from the Project Site, the HRA evaluated the potential health risk impacts to the future Project residents from freeway toxic air contaminant (TAC) emissions (i.e., diesel particulate matter) from SR-110.

The HRA determined that future on-site Project residents would be provided an adequate health-based separation distance from SR-110. With the use of maximum efficiency report value (MERV) 13 indoor air filtration in regularly occupied spaces of residential uses with mechanically ventilated buildings, as required by LAMC Section 99.04.504 for residential uses within 1,000 feet of a freeway, the incremental increase in cancer and non-cancer impacts would not exceed the SCAQMD numerical thresholds for health risk impacts. As such, the Project would not result in a risk of a public health exposure at a level that would exceed the standards established by any state or federal agency.

d) The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or a seismic hazard zone. The nearest fault zone is located approximately 0.19 miles to northeast and is associated with the Elysian Park Thrust Fault (Attachment F, *Geology Report*). As with any new project development in the State of California, building design and construction are required to conform to the current seismic design provisions of the City's Building Code, which incorporates relevant provision of the 2016 California Building Code (CBC). The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Conformance with the 2016 CBC requirements would reduce the potential for structures on the Project Site to sustain damage during an earthquake event, and would ensure that the Project would not

expose people or structures to substantial adverse effects associated with seismic ground-shaking to any greater extent than other properties in the Southern California region. Impacts to seismic ground-shaking would be less than significant. According to Geotechnical investigations conducted for the Project Site (Attachment F, *Geology Report*), the Project Site is located within a potentially liquefiable area. As part of development of the Project Site, the existing fill would be removed during excavation. Pursuant to existing law and applicable regulations, design, and construction of the Project would be required to incorporate measures to protect against liquefaction risks. The measures include compliance with the 2016 CBC, the Rules of General Application of the Grading Division of the City of Los Angeles Department of Building and Safety, the City's building permit requirements, and site-specific engineering recommendations based upon the recommendations of a licensed geotechnical engineer and a geotechnical report approved by the City of Los Angeles Department of Building and Safety. Adherence to these measures would ensure that impacts related to liquefaction would be less than significant. e) The Project Site is not subject to flood plain, flood way, or restricted zone hazards. The Project would include housing, but would not be located in a 100-year flood hazard area, according to the Los Angeles Safety Element. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the Project Site is located outside of any Special Flood Hazard Areas (SFHAs). Further, the Project Site is not located with a potential inundation area. Additionally, there are no levees or dams in the Project vicinity. Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, would occur.		
(7) The TPP site is not located on developed open space. The Project Site is located within a highly urbanized area that includes a mixture of low-, mid-, and high-rise buildings containing a variety of uses including commercial, retail, office, and residential uses. The Project Site is currently developed with a two-story multi-tenant commercial building and a surface parking lot. The Project is designated as Regional Commercial in the City of Los Angeles General Plan with a corresponding zoning designations of C2-2 and [Q]C2-2 which permits commercial and multi-family uses. Therefore, the Project Site is not located on developed open space.	X	
(8) The TPP building would be 15 percent more energy efficient than Title 24 standards, and the TPP building and landscaping are designed to achieve 25 percent less water usage than the average household use in the region. The Project would be designed to be 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to achieve at least 25 percent less water usage than the average household use in the region (Attachment C, *Energy and Water Efficiency Compliance Report*). The Project would achieve its energy efficiency through the implementation of multiple measures including, but not limited to, overhanging balconies for solar shading, high performance windows, daylighting controls and other forms of high-efficiency lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems, and centralized hot water system and high-efficiency water fixtures. The Project would achieve its water efficient through multiple measures including high efficiency water using appliances such as high water efficiency appliances, low-flow fixtures and faucets, water-saving pool features, water efficient irrigation systems, and drought-tolerant landscaping. (Attachment C, *Energy and Water Efficiency Compliance Report*).	X	

To be considered a Sustainable Communities Project, the Transit Priority Project must comply with all of the following land use criteria, as defined by PRC Section 21155.1(b).		
(1) The TPP site is not more than 8 acres. The Project Site maintains a pre-dedicated lot area of approximately 29,575 square feet. The Project is requesting to merge 7 feet of an existing 10 feet dedication along North Broadway and that would result in a lot area of 28,806 sf or 0.66 acres. Therefore, the proposed Project is less than 8 acres.	X	
(2) The TPP would not contain more than 200 residential units. The Project would consist of a mixed-use residential commercial building containing 178 residential units. Therefore, the Proposed Project would not contain more than 200 residential units.	X	
(3) The TPP would not result in any net loss in the number of affordable housing within the project area. The Project Site is currently developed with a two-story multi-tenant commercial building and surface parking lot. No existing residential units are located on the Project Site. The Proposed Project would provide 178 dwelling units with nine of the units designated for very-low income households. Therefore, the Project would increase the number of affordable housing units within the Project area and would not displace or remove any existing affordable units.	X	
(4) The TPP does not include any single level building exceeding 75,000 square feet. The Proposed Project would develop a 221,725 square feet 27 story mixed use building. Therefore, the Project does not include a single level building exceeding 75,000 square feet.	X	
(5) Applicable mitigation measures or performance standards in prior EIRs would be incorporated into the TPP. The 2016 SCAG RTP/SCS Mitigation Monitoring and Reporting Program (SCAG MMRP) does not include project level mitigation measures that would be required of the Project. The SCAG MMRP provides a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects.[6] The SCAG's measures are not prescriptive on the Project, but nonetheless, the mitigation measures required by the Conditions of Approval for the Project are consistent with those applicable measures suggested in SCAG's MMRP, detailed below. Please refer to Section 4.0, *Project Consistency with SCAG 2016-2040 RTP/SCS Mitigation Measures* for a full discussion of the Project's consistency with SCAG's MMRP. As noted therein, many of the mitigation measures identified by SCAG, beyond those discussed below, would not apply to the Project and, therefore, would not be incorporated into the TPP.	X	
(6) The TPP would not conflict with nearby operating industrial uses. To the northeast of the Project Site, is a long narrow site zoned MR2-1 (Restricted Light Industrial) with a General Plan Land Use designation of Light Manufacturing. This site is primarily vacant and includes surface parking, associated accessory structures, and fencing. An application was filed in October of 2017 (CPC-2016-4063-GPA-ZC-HD-ZAD-	X	

[6] (SCAG, 2016-2040 RTP/SCS PEIR, Exhibit B Mitigation Monitoring and Reporting Program, available at: http://scagrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf, 2016), Accessed July 21, 2018.

SPR) for the proposed redevelopment of the site into a mixed-use residential and commercial development. Therefore, while the general plan land use designation and zoning for the nearby site is for industrial and manufacturing, actual land uses on the site are not currently operating as industrial uses and it is proposed for redevelopment as residential and commercial uses. To the east of the Project Site directly across the Metro Gold Line tracks and North Spring Street, is a large parcel with a General Plan designation of Hybrid Industrial which permits residential, commercial, community-serving, and industrial uses. This site is located in the southwestern Cornfield Arroyo Seco Specific Plan (CASP) area and has a zoning designation of Urban Center under the CASP. The site is currently vacant and is periodically used for parking by nearby industrial and commercial businesses. The site is currently in process for redevelopment into a large mixed-use project, which would include residential, commercial, and open space uses. A Draft EIR was circulated for the site in March 2018 (College Station DEIR, ENV-2012-2055-EIR). Therefore, while the general plan land use designation for the nearby site is for industrial uses, actual land uses on the site are not currently operating as industrial uses and it is planned for a future mixed-use development. Other land uses further to east, over 800 feet from the Project Site, have a General Plan designation of Hybrid Industrial. These uses are located in the CASP area and include a mix of industrial and commercial uses. The corresponding zoning designation for these uses under the CASP is Urban Center, Urban Innovation, and Urban Village Zoning. The CASP aims to transition these industrial areas to include new mixed-use development and open spaces. The CASP sets forth standards and zoning to protect and ensure compatibility between existing light industrial uses from the new proposed residential and mixed-use development proposed under the CASP. Due to the distance of over 800 feet and since these sites are separated from the Project by the Metro Gold Line tracks and North Spring Street, and future implementation of the industrial uses is regulated by the CASP, Project is not expected to conflict or interfere with any of the existing operating industrial uses to the east. Therefore, implementation of the Project would not conflict or interfere with any of the existing nearby operating industrial uses.		
(7) The TPP is located within one-half mile of a rail transit station or a ferry terminal included in a RTP or within one-quarter mile of a high-quality transit corridor included in a RTP. The Project Site is located less than one-half mile of a Major Transit Stop with an existing rail station. Specifically, the Project is located is located approximately less than 400 feet northwest of the Metro Rail Gold Line Chinatown rail station (Attachment B: *High Quality Transit Area and Transit Priority Area Maps*). The Project Site satisfies the CEQA exemption transit proximity requirement by being within ½ mile of a light rail station and is therefore not required to further demonstrate proximity to intersecting bus routes or high quality transit corridors that provide bus service intervals of 15 min or less. Furthermore, the Project Site is located in proximity to multiple bus stops with high frequency transit service. The Project Site is serviced by nearby bus lines including DASH Downtown, DASH Lincoln Heights/Chinatown, and regular Metro lines 28, 45, and 83. The Project Site is also located approximately 0.12 miles from the Hill and College Streets bus stop which is serviced by Metro Rapid 794 and regular Metro lines 81, 90/91, 94, and 96. While these locations do not provide intersecting bus routes with 15 minute headways or less in the peak hours, with many bus lines serving the Project Site, the Project is well served by bus transit access.	X	

To be considered a Sustainable Communities Project, the Transit Priority Project must meet at least one of the following three criteria, as defined by PRC Section 21155.1(c).		
a. At least 20 percent of the housing would be sold to families of moderate income, or not less than 10 percent of the housing would be rented to families of low income, or not less than 5 percent of the housing is rented to families of very low income, and the TPP developer provides sufficient legal commitments as outlined in PRC Section 21555.1(c)(1)(B) to ensure the continued availability and use of the housing units for very low, low-, and moderate-income households. **b. The TPP developer would pay in-lieu fees sufficient to result in the development of an equivalent number of affordable units that would otherwise be required as outlined in the previous question.** **c. The TPP provides public open space equal to or greater than 5 acres per 1,000 residents of the project.** In accordance with Option a., the Project would provide six percent of the total 178 units (nine affordable units) to families of very-low income for at least 55 years, consistent with subdivision (a). Pursuant to Senate Bill 1818 (Government Code Section 65915), LAMC Section 12.22A25 and the Project's conditions of approval, the Applicant must record a covenant against the subject property ensuring the continued availability and use of the Project's nine Very Low Income units for a 55-year period.	X	
If "No" was checked to any of the above boxes, the TPP project is not a Sustainable Communities Project and does not qualify for a full CEQA exemption under PRC Section 21155.1. The TPP however, may qualify for CEQA streamlining under a Sustainable Communities Environmental Assessment or Limited EIR. (PRC Section 21155.2).		

3.0 Project Consistency with the Goals and Benefits of the 2016-2040 RTP/SCS

The following evaluates the Project's consistency with the goals and benefits of the 2016-2040 RTP/SCS. Only goals and benefits that are applicable to the Project are discussed below.

3.1 2016 RTP/SCS Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness

Not applicable. This goal is directed towards SCAG and the City of Los Angeles and does not apply to the Project. No further discussion is required.

3.2 2016 RTP/SCS Goal 2: Maximize mobility and accessibility for all people and goods in the region.

Consistent. The City of Los Angeles has conducted a comprehensive study that describes the baseline health conditions in the City and provides a context for understanding the demographic conditions, social and economic factors, physical environment, access to health care, and health behaviors contributing to the health of City residents and workers. The findings are documented in the *Health Atlas for the City of Los Angeles* (Health Atlas), published in June 2013.[7] While the primary focus of the Health Atlas is on factors that affect the health behaviors and health status of residents and workers, much of the data is relevant to land use transportation and greenhouse gas (GHG) emissions as those topics reflect similar issues regarding land use patterns, urban design, and transportation systems. Data in the Health Atlas is organized by Community Plan Area (CPA).

The Project Site is located in the Central City North CPA. According to the City data in the Health Atlas, the Central City North CPA is rated a 1 on the Walkability Index Score by Community Plan Area, which reflects medium walkability. City data in the Health Atlas also indicated that the Central City North CPA has the sixth highest percentage of workers (approximately 24 percent) commuting to work by walking, biking, and public transportation. The statewide percentage of workers that commute to work by walking, biking, and public transportation is approximately 5.2 percent, based on census data for the 2011 to 2015 period. As the Health Atlas only tracks data at the CPA level, walkability data was also gathered for the Project Site specifically. According to the Walkscore.com, the Project Site is rated a score of 92 for walk score, which means most errands can be accomplished on foot and many residents are able to forgo owning a car. The Project Site also rates "Excellent Transit" in transit with an 83, which means alternative modes of transportation are convenient for most trips.

The Project Site is located in transit-rich and pedestrian accessible locations with connectivity to many areas within the City. The Metro Gold Line Chinatown Rail Station is in close proximity to the Project Site; less than 400 feet southeast of the Project Site, with service to east Los Angeles and Azusa (Transit Maps, Attachment C). The Project is also located in proximity to

[7] City of Los Angeles, The Health Atlas, (2013). Available at http://healthyplan.la/the-health-atlas/. Accessed May 3, 2018.

multiple bus stops with high frequency transit service. Nearby transit service includes DASH Downtown, DASH Lincoln Heights/Chinatown, and regular Metro lines 28, 45, and 83. The Project Site is also located approximately 400 feet north of a Metro Bus stop near the corner of North Broadway and College Street which is serviced by Metro Rapid 794 and regular Metro lines 81, 90/91, 94, and 96.

The *Mobility Plan 2035*, which was initially adopted by the City Council in August 2015 and amended in November 2015, January 2016, and September 2016, is a comprehensive update of the City's Transportation Element that incorporates "complete streets" principles.[8] The *Mobility Plan 2035* identifies a Transit Enhanced Network (TEN), a Neighborhood Enhanced Network (NEN) to support pedestrian activity, and an expanded Bicycle Enhanced Network (BEN). Among other provisions, the *Mobility Plan 2035* includes roadway designations pursuant to updated policies and current transportation needs in the City. The *Mobility Plan 2035* also incorporates by reference and updates provisions of City's *2010 Bicycle Plan*; and serves as the basis for discussion of impacts on bicycle facilities below. The *Mobility Plan 2035* designates a network of bicycle lanes (Tier 1 Protected, Tier 2 and Tier 3) and bicycle paths.

Near the Project Site, Tier 2 bike lanes are provided along Stadium Way west of Chavez Ravine Place, Figueroa Street south of West Cesar E. Chavez Avenue, Spring Street south of Cesar E. Chavez Avenue, and Main Street south of East Cesar E. Chavez Avenue.[9] Future bicycle lanes near the Project Site that are planned for in the *2010 Bicycle Plan* and the *Mobility Plan 2035* include North Broadway, North Spring Street, Hill Street, College Street and Alpine Street. The Project would encourage the utilization of transit due to its close proximity to bus lines, the Metro Gold Line Chinatown Rail Station, and bicycle lanes. The Project would include 245 bicycle parking spaces, which exceeds LAMC's requirements. Therefore, the Project is consistent with this goal.

3.3 2016 RTP/SCS Goal 3: Ensure travel safety and reliability for all people and goods in the region.

Consistent. The Project is located in a dense urban area, and would be a greater intensity than current existing development on the Project site. The Project would be comprised of four levels of office space, street level commercial uses, and 178 rental dwelling units, of which, nine will be very low income affordable rental housing. Increased density provides a foundation for the implementation of other strategies such as enhanced transit services and facilitates the use of transit by more people. Given the Project's close proximity to ten bus lines and the Metro Gold Line Chinatown Rail Station, the Project will encourage the utilization of transit as a mode of transportation to and from the Project area. Thus, the Project will contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. The Project is consistent with this goal.

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[8] City of Los Angeles General Plan, Mobility Plan 2035, An Element of the General Plan, page 13. https://planning.lacity.org/documents/policy/mobilityplnmemo.pdfAccessed August 27, 2018.

[9] Los Angele Department of City Planning, 2010 Bicycle Plan, March, 2011. Available at: https://planning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf Accessed July 2018

3.4 2016 RTP/SCS Goal 4: Preserve and ensure a sustainable regional transportation system

Not applicable. This goal is directed towards SCAG and does not apply to the Project. Nevertheless, the Project would be located in close proximity to the Metro Gold Line Chinatown Rail Station, DASH, and numerous Metro bus lines. As a result, Project residents, workers, and visitors would utilize the nearby mass transit options which would further SCAG's goal to preserve and ensure a sustainable regional transportation system.

3.5 2016 RTP/SCS Goal 5: Maximize the productivity of our transportation system.

Consistent. The Project would encourage the use of mass transit, walking and bicycling, as the Project would locate mixed-use residential and commercial development on a Project Site that is located near numerous bus lines, a Metro Gold Line Station, and bike lanes. Given the Project would develop residential uses within walking distance of existing bus lines and light rail transit stations, and would also provide long-term and short-term bicycle parking, the Project will provide opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project area. Thus, the Project will encourage the utilization of mass transit as a mode of transportation to and from the Project area and contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. The Project is consistent with this goal.

3.6 2016 RTP/SCS Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).

Consistent. The Project will facilitate the use of alternative modes of transportation which will aid in reducing car trips and positively impact air quality. The Project includes 245 bicycle parking spaces for the residential and commercial uses of the Project. The Project would encourage pedestrian travel by incorporating new residential and commercial development within walking distance of businesses in the area, as well as within close proximity to transit. Furthermore, the Project would include a pedestrian plaza, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience.

3.7 2016 RTP/SCS Goal 7: Actively encourage and create incentives for energy efficiency, where possible.

Consistent. The Project would be required to comply with California Building Code Title 24. To determine the Project's specific energy and water use, an Energy & Water Efficiency Compliance Memo has been prepared (Attachment C: *Energy and Water Efficiency Compliance Report*). As shown therein, the Project would be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region. The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, overhanging balconies for

solar shading, high performance windows, daylighting controls and other forms of high-efficiency lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems, and centralized hot water system and high-efficiency water fixtures. The Project would include water facing features such as high water efficiency appliances, low flow faucets and fixtures, water-saving pool features, water efficient irrigation systems, and drought-tolerant landscaping.

3.8 2016 RTP/SCS Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.

Consistent. The Project would encourage the use of transit, walking and bicycling, as the Project would locate mixed-use residential, office, and commercial development on a Project Site that is located near numerous bus lines, a Metro Rail Station, bike lanes, and a pedestrian network. The Project would be a greater intensity than what currently exists on the Project Site and would set aside six percent of the total units (nine affordable units) to families of very low income for at least 55 years. Increased density provides a foundation for the implementation of other strategies such as enhanced transit services and facilitates the use of transit by more people. In turn, as transit ridership in an area increases with density, local transit providers are justified in providing enhanced transit services for the area. As a result, the Project would encourage land use and growth patterns that facilitate transit and active transportation by: providing a mix of land uses; creating a range of housing opportunities and choices for people at different income levels; creating walkable areas; providing infill development within existing communities; providing a variety of transportation choices; and providing opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project site. The Project is consistent with this goal.

3.9 2016 RTP/SCS Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning and coordination with other security agencies.

Not applicable. This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required.

3.10 2016 RTP/SCS Benefit 1: The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvements, and efficient transportation infrastructure.

Consistent. The Project would encourage the use of transit, walking and bicycling, as the Project would locate mixed-use residential and commercial development on a Project Site that is located near numerous bus lines, a Metro Gold Line Rail Station, and bike lanes. The Project would provide a variety of dwelling unit sizes, including studio, one-bedroom, two-bedroom and three-bedroom units that accommodate a range of household types and sizes. In addition, the Project would set aside six percent of the total units (nine affordable units) to families of very low income for at least 55 years. The Project includes 245 bicycle parking spaces for residential and

commercial uses. The Project has been designed to include a ground floor plaza with outdoor dining areas, landscaping, and a water feature. The Plaza would be located at the north end of the Project Site along North Broadway adjacent to the existing crosswalk which connects the Project Site to the Chinatown East Gate. The Project would widen the existing crosswalk. As such, the pedestrian plaza would provide a visual and physical link to the surrounding pedestrian streetscape as well as the nearby Chinatown East Gate; a popular gathering area. The Project would also would enhance the streetscape and walkability by providing ground floor commercial use, street trees, and landscaping.

The Project is located in a major metropolitan area that is well served by regional and local transit, as well as other modes of transportation. The Project is located is located approximately less than 400 feet (0.07 miles) northwest of the Metro Rail Gold Line Chinatown light rail station. The Project is also located in close proximity to multiple bus routes including Metro and DASH Lines with high frequency transit service.

The Project would also provide long-term and short-term bicycle parking which would help people have more opportunities to bicycle, walk and pursue other active alternatives to driving. The Project's location in an urban infill area would provide residents and visitors with shopping and dining options that are easily accessible on foot or by bicycle. The Project will contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. The Project is consistent with this goal.

3.11 2016 RTP/SCS Benefit 2: The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.

Not applicable. Benefit 2 is directed towards SCAG and does not apply to the Project. Nevertheless, the Project is an infill, mixed use project located within a High Quality Transit Area and a Transit Priority Area, thereby decreasing time and cost of traveling between places.

3.12 2016 RTP/SCS Benefit 3: The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.

Consistent. The Project would be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to be designed to achieve at least 54 percent less water usage than the average household use in the region. The Project would achieve its energy efficiency through the implementation of multiple measures including, but not limited to, overhanging balconies for solar shading, high performance windows, daylighting controls and other forms of high-efficiency lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems, and centralized hot water

system and high-efficiency water fixtures. The Project would achieve its water efficient through multiple measures including water efficiency appliances, low flow faucets, water-saving pool features, water efficient irrigation systems, and drought-tolerant landscaping.

The Project would also allow for lower transportation costs for the Project's future residents by incorporating bicycle-and pedestrian-friendly elements and being located near various bus lines, and the Metro Gold Line Chinatown Station. The Project's location and design will provide future residents with various affordable transportation options. The Project is consistent with achieving this benefit.

3.13 2016 RTP/SCS Benefit 4: Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.

Consistent. The Project would encourage improved access and mobility by providing residential uses for people at different income levels within walking distance of existing bus lines and light rail transit stations, including numerous Metro and LADOT and DASH bus lines. The Project Site is less than 400 feet from the Metro Gold Line Chinatown Rail Station. The Project would also provide long-term and short-term bicycle parking which would help people have more opportunities to bicycle, walk and pursue other active alternatives to driving. The Project's location in an urban infill area would provide residents and visitors with shopping and dining options that are easily accessible on foot or by bicycle. The Project's design and location would help to improve air quality and the well-being of people as they would have greater opportunities for pedestrian and bicycling activity and to reduce their reliance on automobiles. The Project is consistent with achieving this benefit.

4.0 Project Consistency with SCAG 2016-2040 RTP/SCS Mitigation Measures

The 2016-2040 RTP/SCS MMRP includes various mitigation measures, both at the regional level that would be implemented by SCAG and at the Project level that would be implemented by the lead agency. Regional mitigation measures would be implemented by SCAG and are therefore not discussed in this table. This table focuses on the Project's consistency with the SCAG MMRP's Project-level mitigation measures. All Project mitigation measures referenced herein are enforceable through the project entitlements as conditions of approval.

PROJECT CONSISTENCY WITH SCAG 2016-2040 RTP/SCS MITIGATION MEASURES

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Aesthetics (AES)		
AES-1: Potential to have a substantial adverse effect on a scenic vista.	MM-AES-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to "break up" large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the	This mitigation measure does not apply to the Project as PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2451 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within TPA pursuant to CEQA. The Project Site is a mixed-use, infill project in a TPA located close to numerous bus transit lines and is less than 400 feet (0.07 miles) northwest of the Metro Rail Gold Line Chinatown light rail station. Additionally, the Project is located in proximity to multiple bus stops with high frequency transit service. The Project Site is serviced by nearby transit lines including DASH Downtown, DASH Lincoln Heights/Chinatown, and regular Metro lines 28, 45, and 83. The Project Site is also located approximately 0.12 miles from the Hill and College bus station which is serviced by Metro Rapid 794 and regular Metro lines 81, 90/91, 94, and 96. during the morning and afternoon peak commute periods. Other bus lines located near the Project Site include LA Metro Lines 10, 16, 17, 20, 603, 720, and Foothill Transit 481.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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.	
AES-2: Potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	No mitigation.	No mitigation applies. As described above, PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."
AES-3: Potential to substantially degrade the existing visual character or quality of the site and its surroundings.	MM-AES-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and	No mitigation applies. As described above, PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable SCAG Lead Agency Ongoing over the life of the Plan Ongoing over the life of the Plan 2016 RTP/SCS Mitigation Monitoring and Reporting Program 12 TABLE 9-2 MITIGATION MEASURES Impact Mitigation Measures Implementing Agency Implementing Date measures identified by the Lead Agency: • Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. • Design projects consistent with design guidelines of applicable general plans. • Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. • Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.	
AES-4: Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Potential to result in shade and shadow impacts.	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: • 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.	No mitigation applies. As described above, PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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) "A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permitees who need to satisfy legal requirements and compensate for the environmental impacts of developmental projects. A privately owned conservation or mitigation bank is a free-market enterprise that: • Offers landowners economic incentives to protect natural resources; • Saves permitees time and money by providing them with the certainty of 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	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	lands for in conjunction with conservation banking programs. • Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. • Include underpasses and overpasses at reasonable intervals to maintain property access. • Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. • Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible. • Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.	
AF-2: Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract.	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 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	This mitigation measure does not apply to the Project, because the Project Site and nearby areas are not zoned for agricultural production, there is no farmland at the Project Site or in nearby areas, and there are no Williamson Act Contracts in effect for the Project Site or in nearby areas.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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: • 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.	
AF-3: Potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	No mitigation.	No mitigation applies.
AF-4: Potential to result in the loss of forest land or conversion of forest land to non-forest use.	MM-AF-1(b) and MM-GHG-3(b).	This mitigation measure does not apply to the Project, because the Project Site is currently non-forest use; therefore, no forest land will be lost or converted to non-forest uses.
AF-5: Potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-	MM-AF-1(b) and MM-GHG-3(b).	This mitigation measure does not apply to the Project because the Project Site is currently not used for any agricultural uses and is not forest

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
agricultural use or conversion of forest land to non-forest use.		land; therefore, no agricultural use or forest land will be converted.
Air Quality		
AIR-1: Potential to conflict with or obstruct implementation of the applicable air quality plan.	No mitigation.	No mitigation applies.
AIR-2: Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.	MM-AIR-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible. CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions: • Minimize land disturbance. • Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. • Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. • Cover trucks when hauling dirt.	The Project would conform to this SCAG mitigation measure, as the City would impose the existing regulatory compliance measures listed below on the Project that have been identified by CARB and the South Coast Air Quality Management District (SCAQMD) as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible. The Project will comply with applicable standards of the CARB and SCAQMD, including the following rules: • **CARB Anti-Idling Air Toxics Control Measure:** This measure, codified in Title 13 California Code of Regulations (CCR) Section 2485, applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time, with certain exception for vehicles where idling is a necessary performance activity such as for concrete trucks. • **Rule 401 – Visible Emissions**: This rule states that a person shall not discharge into the atmosphere from any single **source** of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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. • 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	• **Rule 402 – Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. • **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must **utilize** one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA. • **Rule 1113 – Architectural Coatings**: This rule requires manufacturers, **distributors**, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories. • **Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to **owners** and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403). In addition to the above regulatory compliance measures, in order to further minimize construction and operational air pollutant emissions, the Project would include a Project Commitment, which would include implementation of best management practices. The Project Commitment is as follows:

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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).	**Project Commitment-AIR-1:** The Project Applicant and all contractors to include the following best management practices in contract specifications: • Ensure that all construction equipment is properly tuned and maintained in accordance with manufacturer specifications. • To the extent available on the Project Site, utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators. • 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 during construction of the Project. • Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines rated at 50 horsepower or greater. Additionally, as discussed under Transportation, Traffic, and Safety, the Project would implement Project Commitment TRAF-1, which requires the preparation of a Construction Management Plan. The Plan requires that the contractor to schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets and schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible. With implementation of CARB and SCAQMD rules and Project Commitments, the Project would minimize construction emissions and would therefore be substantially in conformance with SCAG MM-AIR-2(b).

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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. • 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.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• The engine size of construction equipment shall be the minimum practical size. • Catalytic converters shall be installed on gasoline-powered equipment. • Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit. • Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite. • Use new or rebuilt equipment. • Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated. • Use low rolling resistance tires on long haul class 8 tractor-trailers. • Suspend all construction activities that generate air pollutant emissions during air alerts. • Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.	
AIR-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable NAAQS or CAAQS.	No mitigation.	No mitigation applies.
AIR-4: Expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially.	MM-AIR-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects 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	This mitigation measure does not apply to the Project, because the Project does not involve a 2016-2040 RTP/SCS transportation project. As a mixed-use development, the Project cannot establish new regulatory standards or requirements, such as setting new engine standards or making improvements and enhancements to California's Smog Check Program. Nonetheless, to demonstrate compliance with Public Resources Code (PRC) Section 21155.1(a)(6)(C), which requires that the transit priority project not result in a risk of a public health

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	cancer risk pursuant to the Air Toxics "Hot Spots" Act of 1987 (AB2588), as applicable and feasible. Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB's strategy includes the following elements: • Set technology forcing new engine standards. • Reduce emissions from the in-use fleet. • Require clean fuels, and reduce petroleum dependency. • Work with US EPA to reduce emissions from federal and state sources. • Pursue long-term advanced technology measures. Proposed new transportation – related SIP measures include: On – Road Sources • Improvements and Enhancements to California's Smog Check Program • Expanded Passenger Vehicle Retirement • Modifications to Reformulated Gasoline Program • Cleaner In-Use Heavy-Duty Trucks • Ship Auxiliary Engine Cold Ironing and Other Clean Technology • Cleaner Ship Main Engines and Fuel • Port Truck Modernization • Accelerated Introduction of Cleaner Line-Haul Locomotives • Clean Up Existing Commercial Harbor Craft • Limited idling of diesel-powered trucks • Consolidated truck trips and improve traffic flow • Late model engines, Low emission diesel products, engine retrofit technology • Alternative fuels for on-road vehicles Off – Road Sources	exposure at a level that would exceed the standards established by any state or federal agency, a Freeway Health Risk Assessment (HRA) was conducted to evaluate the potential health risk impacts to the future Project residents from freeway toxic air contaminant (TAC) emissions (i.e., diesel particulate matter) from State Route (SR) 110. In 2012, the City of Los Angeles Planning Commission issued Zoning Information No. 2427, Freeway-Adjacent Advisory Notice for Sensitive Uses, regarding the need to consider the public health implications of certain freeway-adjacent projects. The Advisory Notice recommends projects that place sensitive receptors in proximity (within 1,000 feet) to a freeway prepare a Freeway HRA. The Advisory Notice is informational in nature and does not impose any additional land use or zoning regulations; it is not a prohibition on development near freeways. Accordingly, for informational purposes, a Freeway HRA has been prepared for the Project. The health risk impacts to the future Project residents are compared to the SCAQMD numerical thresholds for health risk impacts. The analysis determined that future on-site Project residents would be provided an adequate health-based separation distance from SR-110 which is located approximately 620 feet northwest from the Project Site. The incremental increase in cancer and non-cancer impacts would not exceed the SCAQMD numerical thresholds for health risk impacts. Therefore, the Project would meet the requirements of PRC Section 21155.1(a)(6)(C). Furthermore, Los Angeles Municipal Code (LAMC) Section 99.04.504 for residential uses within 1,000 feet of a freeway requires that maximum efficiency report value (MERV) 13 indoor air filtration be installed in regularly occupied spaces of residential uses with mechanically ventilated buildings, which would further reduce TAC exposures of diesel particulate matter, further minimizing health risk impacts to future Project residents.

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

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

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully-Protected Species afforded protection pursuant to the State Fish and Game Code. • Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds. • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season. • Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities. • Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate. • Encourage project design to avoid sensitive natural communities and	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	riparian habitats, wherever practicable and feasible. • Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats. • Install fencing and/or mark sensitive habitat to be avoided during construction activities. • Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area. • Revegetate with appropriate native vegetation following the completion of construction activities. • Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). • Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
BIO-3: Potential to have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	MM-BIO-1(b) and MM-BIO-2(b). 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	These mitigation measures do not apply to the Project, because the Project Site is not located on protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. • Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB). • Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as 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	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: – Permittee-responsible mitigation – Contribution of in-lieu fees – Use of mitigation bank credits • Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affected and, if necessary, perform a formal wetland delineation.	
BIO-4: Potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	MM-BIO-1(b), MM-BIO-2(b), and MM-BIO-3(b). MM-BIO-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and polices of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the	The Project is located in a developed, urban area and would be replacing existing commercial development. The Project would not be developed on existing open space. The Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulations, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	Migratory Bird Treaty Act during the breeding season may occur. • Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement. • Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. • Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible. • Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31. • Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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 CNDDB by a qualified biologist to determine the risk of habitat fragmentation. • Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). • Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible. • Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	and appropriate for the species of concern. • Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction • Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas. • Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: – Wildlife movement buffer zones – Corridor realignment – Appropriately spaced breaks in center barriers – Stream rerouting – Culverts – Creation of artificial movement corridors such as freeway under- or overpasses – Other comparable measures • Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. • Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species. • Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.	
BIO-5: Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), and MM-BIO-4(b). MM-BIO-5(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. • Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that	The Project is located in a developed, urban area and would be replacing existing commercial development. The Project would not be developed on existing open space. Furthermore, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulations, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. The Project Site does not contain any protected trees. Thus development of the Project will not conflict with any local policies or ordinances protecting biological resources and these mitigation measures do not apply.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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 protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. • Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. • Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration. • If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. • Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. • Design projects to avoid conflicts with local policies and ordinances protecting biological resources. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: – Avoidance strategies – Contribution of in-lieu fees – Planting of replacement trees at a minimum ratio of 2:1 – Re-landscaping areas with native vegetation post-construction	
BIO 6: Potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	See MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), and MM-BIO-5(b). MM-BIO-6(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the	The Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Therefore, these mitigation measures do not apply.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. • Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in MM-BIO-1(b), where applicable.	
Cultural Resources		
CUL-1: Potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features.	MM-CUL-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and	Under PRC Section 21155.1, transit priority projects are not required to evaluate effects to paleontological resources; however, the Project conforms to this mitigation measure, as the Project would be required to comply with existing regulations related to the discovery of unknown paleontological resources should they be

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. • Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources. • Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible: – All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. – Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage,	encountered during ground disturbing activities as outlined in SCAG MM-CUL-1(b).

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	documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP. – Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. – Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas. • Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance. • Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.	
CUL-2: Potential to cause a substantial adverse change in the significance of a historical resource, including tribal cultural resources, as defined in CEQA Guidelines Section 15064.5.	MM-CUL-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of	Pursuant to CEQA Guidelines Section 15064.5 a Historic Resources Technical Report and supplemental memorandum was conducted for the Project which satisfies the requirements set forth in SCAG MM-CUL-2(b) to identify if previously evaluated or previously unknown historical resources are present (Attachment H: *Historic Report Memo and Historic Resource Technical Report*). The Historic Resources Technical Report, April 2018 determined that the existing building on the Project Site is not eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or as a Los

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified. • Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. • Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: – Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration,	Angeles Historic-Cultural Monument due to a lack of significance. The existing building on the Project Site is not a contributor to a potential historic district under the federal, state, or local designation programs. A supplemental memorandum, dated October 3, 2018 was prepared providing additional research supporting the conclusion of the Historic Resources Technical Report that the existing building is ineligible as a historic resource. As the existing building on the Project Site that would be removed is not a historical resource, the Project would have no direct impacts on historical resources related to the built environment. The Historic Resources Technical Report indicated that there are 19 listed and potential historical resources in the study area and determined that the Project would have a less than significant indirect impact on the identified 19 historical resources. While the Project would introduce a new visual element to the immediate surroundings of the historical resources in the study area, the Project would not result in a substantial adverse change to the integrity of these historical resources to the degree that they would no longer be eligible for listing as historical resources defined by CEQA. Indirect impacts to historic resources related to the built environment would be less than significant. Pursuant to CEQA Guidelines Section 15064.5 a Cultural Resources Assessment Report (Attachment H: *Historic Report Memo and Historic Resource Technical Report*) was prepared which also satisfies the requirements set forth in SCAG MM-CUL-2(b), to identify if previously evaluated or previously unknown historical resources, including archaeological or tribal cultural resources. The Cultural Resources Assessment determined that one historical resource, the *Zanja Madre*, bisects the northeastern corner of what is presently the Project Site. For the purposes of this Project, the City of Los Angeles is treating the *Zanja Madre* as a "historical resource" under CEQA Guidelines Section 15064.5(a)(3). In addition, the outreach to the NAHC indicated positive results from the Sacred Lands File search. Consultation with tribal

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. o Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. • 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.	representatives provide by the NAHC indicated that the *Zanja Madre* is included in the Sacred Lands File and the Project Site is sensitivity due to the close proximity of prehistoric and historic Native American villages to the Project Site as well as known Native American burial sites in the vicinity of the Project. Preparation of this study has fulfilled SCAG MM-CUL-2 (b) and the following Project Commitment shall apply to the Project and its construction: 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 may include the following, or other comparable measures identified by the Lead Agency: • 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. • 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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. • Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated. • Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.	limited to grading, excavation, trenching, or removal of existing features of the subject property. • Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated. • Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources. **Project Commitment Cultural -1:** In order to avoid impacts to the Zanja Madre, a historical resource, the Project has been designed to include a permanent setback area, both horizontally and vertically, around the mapped and possibly preserved in place Zanja segment that may be located on the northeast corner of the Project Site. The permanent setback area includes a 5-foot buffer on each side of the conduit as it is mapped on an 1890 LADWP as-built drawing of the Project Site. The mapped location of the permanent setback area is included in the Project plans and design drawings. • The permanent setback area includes an Above Ground Activities Implementation area that restricts mechanical excavation or compacting surface treatment or landscaping in this area. The plans have designed the permanent setback to be leveled to no more than an elevation of 305.15 feet throughout the permanent setback area. The Project plans also include landscaping in the area that is drought tolerant landscaping and thus does not require heavy watering or have extensive root systems that could disturb or degrade the condition of the Zanja Madre segment in this location. • Excavation within the Above Ground Activities Implementation area, landscaping, and any necessary paving will be conducted with non-

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		vibratory hand tools. Accordingly, if vibration levels monitored for the Project during any construction activities over the permanent setback area meet or exceed 0.08 PPV, construction activity shall immediately cease and measures necessary to ensure vibration level is not exceeded shall be implemented prior to resuming construction activities. Qualified vibration monitors will be on-site working with the qualified archaeological monitor to ensure implementation and to identify any potential impacts during hand digging or landscaping within the permanent setback area. Any paving stones required should be set in sand or decomposed granite materials that do not require compaction. During construction, vibration monitors shall be placed within at least 10 feet of the permanent setback area and shall be located directly between any construction activity and the permanent setback area. If support of the plaza or a walkway is required, it will be cantilevered over the permanent setback area, and supported by piles on either side of it. The installation of these piles will be in accordance with Project design and will avoid the setback area including its buffer zone. Moreover, during any surface construction activities that occur directly over the permanent setback area for the construction of landscaped Project areas, vibration monitoring will be conducted to ensure no damage to the potential Zanja is caused by any such construction activity. • The Project design will include a Tieback and Shoring Limited Exception Implementation area for the shoring of the subterranean parking foundation wall in order to provide support for the shoring. As shoring will be necessary, a 20-foot deep vertical permanent setback area is established where shoring tiebacks are prohibited. The vertical extent of the permanent setback and buffer ends 20 feet below at the elevation of adjacent Capitol Milling. The 20-feet depth includes the entire 3-foot diameter conduit at a potential depth of up to 15-feet from the base of the conduit plus a 5-foot buffer below it. No other Project construction activities will be permitted within the permanent setback area. All subsurface operations, including the installation of piles will be monitored by the qualified

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
		archaeologist in order to ensure adherence to the Project design plans. The monitor will conduct worker training prior to the initiation for ground-disturbing activities in order to inform workers of the types of resources that may be encountered and advise them of the proper avoidance of such resources. Project plans, Project commitments, this report and testing results will be provided to the qualified archaeologist in advance of construction. Project plans and Project commitments will be provided to any construction personnel that could be working in this area. The construction contractor will use a qualified archaeological monitor, working under the supervision of a qualified archaeological Principal Investigator, during ground disturbing activities. These activities include but are not limited to, demolition of pavement, foundations, footings, trenching, grading, installation of tie-backs, piling, landscaping, and over excavation within the Project Site. The qualified archaeologist will conduct worker training prior to the initiation for ground-disturbing activities in order to inform workers of the types of resources that may be encountered and advise them of the proper handling of such resources. The archaeological monitor will have the authority to redirect construction equipment in the event potential archaeological resources are encountered. In the event archaeological resources are encountered, the Applicant and the City will be notified immediately and work in the vicinity of the discovery will halt until appropriate treatment of the resource, is determined by the qualified archaeological Principal Investigator in accordance with the provisions of CEQA.
CUL-3: Potential to cause a substantial adverse change in the significance of an archaeological resource, including tribal cultural resources, pursuant to CEQA Guidelines Section 15064.5.	See MM-CUL-2(b).	Pursuant to CEQA Guidelines Section 15064.5 a Cultural Resources Assessment Report (Attachment H: *Historic Report Memo and Historic Resource Technical Report*) was prepared which also satisfies the requirements set forth in SCAG MM-CUL-2(b), to identify if previously evaluated or previously unknown historical resources, including archaeological or tribal cultural resources. The Cultural Resources Assessment determined that one historical resource, the *Zanja Madre*, bisects the southeastern corner of what is presently the Project Site. For the purposes of this Project, the City of Los Angeles is treating the *Zanja Madre* as a "historical resource" under CEQA Guidelines Section 15064.5(a)(3). In addition, the outreach to the NAHC indicated positive results from the

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
		Sacred Lands File search. Consultation with tribal representatives provide by the NAHC indicated that the *Zanja Madre* is included in the Sacred Lands File and the Project Site is sensitivity due to the close proximity of prehistoric and historic Native American villages to the Project Site as well as known Native American burial sites in the vicinity of the Project. Preparation of this study has fulfilled SCAG MM-CUL-2 (b) and the SCAG mitigations as outlined above in MM-CUL-2 (b) shall apply to the project and its construction. In addition, a Project Commitment for avoidance and preservation of the *Zanja Madre*PDF-CUL-1 (See MM-CUL-2(b)) would avoid a substantial adverse change in the significance of an archaeological resources including tribal cultural resources.
CUL-4: Potential to disturb human remains, including those interred outside of formal cemeteries, including Native American Sacred Sites.	MM-CUL-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060 and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a 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.	The Project already substantially conforms to this mitigation measure, because the Project would be subject to existing regulations provided in MM-CUL-4(b) regarding the discovery of human remains.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• If any discovered remains are of Native American origin: – Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. – If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: o The Native American Heritage Commission is unable to identify a descendent; o The descendant identified fails to make a recommendation; or o The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Energy		
EN-1: Potential to increase petroleum and nonrenewable fuel consumption in the regional transportation system.	No mitigation.	No mitigation applies.
EN-2: Potential to increase residential energy consumption use.	MM-EN-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including: – Use energy efficient materials in building design, construction, rehabilitation, and retrofit. – Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. – Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for 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.	The Project already substantially conforms to this mitigation measure as it would be required to comply with California Building Code Title 24. To determine the Project's specific energy and water use, an Energy & Water Efficiency Compliance Memo has been prepared (Attachment C: *Energy and Water Efficiency Compliance Report*). As shown therein, the Project would be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region. The Project would achieve its energy efficiency through the implementation of multiple measures including, but not limited to, enhanced exterior wall and roof insulation, overhanging balconies for solar shading, high performance windows, daylighting controls and other forms of high-efficiency lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems, and centralized hot water system and high-efficiency water fixtures. The Project would achieve its water efficient through multiple measures including low flow fixtures and faucets, water saving pool features, water efficient irrigation systems, and drought tolerant landscaping (Attachment C: *Energy and Water Efficiency Compliance Report*).

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– Prohibit gas-powered landscape maintenance equipment. – Install electric vehicle charging stations. – Reduce wood burning stoves or fireplaces. – Provide bike lanes accessibility and parking at residential developments.	
EN-3: Potential to increase building energy consumption in anticipated development.	MM-EN-2(b).	The Project already substantially conforms to this mitigation measure, because the Project would be required to comply with the City's Green Building Code Title 24, which incorporates the requirements of CALGreen. The Project's energy use would be at least 15 percent less than Title 24, Part 6 2016.
EN-4: Potential to increase water consumption and energy use related to water in anticipated development.	No mitigation.	No mitigation applies. Nevertheless, the Project would be required to comply with the City's Green Building Code Title 24, which incorporates the requirements of CALGreen. The Project's water use would be at least 25 percent below the SCAG average household use in the region.
Geology and Soils		
GEO-1: Potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic related ground-failure, including liquefaction; (iv) landslides.	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: • Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning	The Project already substantially conforms to this mitigation measure, because the Project would be required to comply with the existing building regulations associated with the City of Los Angeles Building Code, which incorporates the Uniform Building Code (UBC) and California Building Code (CBC). A Geotechnical Investigation was conducted for the Project Site (Attachment F: *Geology Report*). As indicated in the Geotechnical Investigation, no known active faults cross the Project Site and the Project site is not within a currently designated Alquist-Priolo Earthquake Fault Zone. As noted, the Project Site is not within a Preliminary Fault Rupture Study area. The Project is located in the seismically active region of Southern California, and is susceptible to ground shaking during a seismic event. As with any new project development in the State of California, building design and construction are required to conform to the current seismic design provisions of the City's Building Code, which incorporates relevant provision of the 2016 California Building Code (CBC). The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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 development associated with the Plan,	earthquake safety. Conformance with the 2016 CBC requirements would reduce the potential for structures on the Project Site to sustain damage during an earthquake event, and would ensure that the Project would not expose people or structures to substantial adverse effects associated with seismic ground-shaking to any greater extent than other properties in the Southern California region. Pursuant to existing law and applicable regulations, design, and construction of the Project would be required to incorporate measures to protect against liquefaction risks (See also MM-GEO-3). The measures include compliance with the 2016 CBC, the Rules of General Application of the Grading Division of the City of Los Angeles Department of Building and Safety, the City's building permit requirements, and site-specific engineering recommendations based upon the recommendations of a licensed geotechnical engineer and a geotechnical report approved by the City of Los Angeles Department of Building and Safety. Adherence to these measures would ensure that impacts related to liquefaction would be less than significant. The Project Site is not subject to flood plain, flood way, or restricted zone hazards. The proposed Project would include housing, but would not be located in a 100-year flood hazard area, according to the Los Angeles Safety Element. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the Project Site are located outside of any Special Flood Hazard Areas (SFHAs). Further, the Project Site is not located with a potential inundation area, being located west of the inundation area for the Los Angeles River. Additionally, there are no levees or dams in the Project vicinity. Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, would occur.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.	
GEO-2: Potential to result in substantial soil erosion or the loss of topsoil.	MM-GEO-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department 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	The Project already substantially conforms to this mitigation measure, because the Project would be designed to comply with the Construction General Permit Water Quality Order 2009-0009-DWQ as amended by Order No. 2010-0014-DWQ to prevent short-term construction water quality (including erosion and sedimentation issues) impacts. These mandatory requirements would minimize soil erosion and the transmission of sediment into the City's separate storm water sewer system. Storm Water Pollution Prevention Plans (SWPPP)s are commonly associated with construction stormwater permits, which are issued by the Regional Water Quality Control Board. As the Project is less than one acre, it does not require a SWPPP. However, the Project's construction activities would require grading, excavation, and foundation permits or approvals from the City of Los Angeles which would include

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	comparable measures identified by the Lead Agency: • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: – File a Notice of Intent (NOI) with the SWRCB. – Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. – Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project.	requirements and standards designed to limit potential impacts associated with erosion to permitted levels. The Project would be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standard. To facilitate this, the proposed stormwater Best Management Practice (BMP) would be bio-infiltration flow-through planters. The entirety of the building's roof drains will be diverted to the bioinfiltration flow-through planters and the overflow discharge would be discharged to North Broadway via a curb drain or parkway drain. Consistent with the CBC and the City of Los Angeles Department of Building and Safety, requirements, a Geotechnical Investigation was conducted for the Project Site (Attachment F: *Geology Report*). The Geotechnical Investigation evaluated the nature, distribution, and engineering properties of the earth materials underlying the Project Site with respect to the design and construction of the proposed Project. As part of the Geotechnical Investigation, six borings were excavated into the ground to collect representative soil samples that underlie the Project Site. Fill soil was encountered in all exploratory excavations to depths of up to 5½ feet below the existing site grade. The fill encountered in the borings consists of silty sand to clayey silt.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– 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.	
GEO-3: Potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	MM-GEO-1(b).	The Project already substantially conforms to this mitigation measure. According to Geotechnical investigations conducted for the Project Site (Attachment F: *Geology Report*), the Project Site is located within a potentially liquefiable area. Pursuant to existing law and applicable regulations, design, and construction of the Project would be required to incorporate measures to protect against liquefaction risks. The measures include compliance with the 2016 CBC, the Rules of General Application of the Grading Division of the City of Los Angeles Department of Building and Safety, the City's building permit requirements, and site-specific engineering recommendations based upon the recommendations of a licensed geotechnical engineer and a geotechnical report approved by the City of Los Angeles Department of Building and Safety.
GEO-4: Potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	MM-GEO-1(b).	The Project already substantially conforms to this mitigation measure. The onsite geologic materials are expected to have a low to moderate Expansion Index due to their granular composition. Pursuant to existing law and applicable regulations, design and construction of the Project would be required to incorporate measures to protect against risks associated with expansive soils. These measures include compliance with the City of Los Angeles

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
		Building Code, the Rules of General Application of the Grading Division of the LADBS, the City's building permit requirements, and site-specific engineering recommendations based upon the recommendations of a licensed geotechnical engineer, a geotechnical report approved by the LADBS. These mandatory requirements would minimize risks related to expansive soils.
GEO-5: Potential to have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	No mitigation.	No mitigation applies.
Greenhouse Gas Emissions and Climate Change		
GHG-1: Potential to directly or indirectly result in an increase in GHG emissions compared to existing conditions (2015).	No mitigation.	No mitigation required.
GHG-2: Potential to conflict with SB 375 GHG Emission Reduction Targets.	No mitigation.	No mitigation required.
GHG-3: Potential to conflict with AB 32 and or any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.	No mitigation.	No mitigation required.
GHG Cumulative Impacts	MM-GHG-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, the Lead Agency can and should consider mitigation measures to mitigate the significant 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	The Project's generation of GHG emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Section 3.0, *942 N. Broadway Project Consistency with the Goals and Benefits of the 2016-2040 RTP/SCS* evaluates the Project's consistency with applicable SCAG 2016-2040 RTP/SCS goals and benefits. As discussed therein, the Project would be consistent with the applicable goals and benefits. Therefore, this mitigation measure does not apply. Additionally, the Project would be in compliance with the requirements for a Transit Priority Project (TPP) including being located within walking distance of a major transit stop (the Metro Rail Gold Line Chinatown light rail station) and multiple bus stops with high frequency transit service including the Broadway/Chinatown bus station serviced by DASH Downtown, DASH Lincoln Heights/Chinatown, and regular Metro lines 28, 45,

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	responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region as set forth below, or through comparable measures identified by Lead Agency: • Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. • Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. • Off-site measures to mitigate a project's emissions. • Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: – Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction; – Use alternative (non-petroleum based) fuels; – Deployment of zero- and/or near zero emission technologies as defined by CARB; – Use lighting systems that are energy efficient, such as LED technology; – Use the minimum feasible amount of GHG-emitting construction materials that is feasible; – Use cement blended with the maximum feasible amount of fly ash or other materials that reduce	and 83 and Metro Rapid 794 and regular Metro lines 81, 90/91, 94, and 96. The Project would also include would provide abundant, secure and well-maintained bicycle parking facilities (245 bicycle parking spaces). The Project building would be designed to be 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region. To determine the Project's specific energy and water use, an Energy & Water Efficiency Compliance Memo has been prepared (*Attachment C:* Energy and Water Efficiency Compliance Report). As shown therein, the Project would be designed to be at least 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to be designed to achieve at least 25 percent less water usage than the average household use in the region. The Project would achieve its energy efficiency through the implementation of multiple measures including, but not limited to, enhanced exterior wall and roof insulation, overhanging balconies for solar shading, high performance windows, daylighting controls and other forms of high-efficiency lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems, and centralized hot water system and high-efficiency water fixtures. The Project would achieve its water efficient through multiple measures including high efficiency water using appliances such as high water efficiency appliances, low-flow fixtures and faucets, water-saving pool features, water efficient irrigation systems, and drought-tolerant landscaping.

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	GHG emissions from cement production; – Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse; – Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy; – Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption; – Use lighter-colored pavement where feasible; – Recycle construction debris to maximum extent feasible; – Protect and plant shade trees in or near construction projects where feasible; and – Solicit bids that include concepts listed above. • Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles. • Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network. • Improving transit access to rail and bus routes by 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,	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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, including: – Developing on infill and brownfields sites; – Building high density and mixed use developments near transit; – Retaining on-site mature trees and vegetation, and planting new canopy trees; – Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and – Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.	
Hazards and Hazardous Materials		
HAZ-1: Potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	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	The Project already substantially conforms to this mitigation measure. Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include the future residents of the Project and the nearby residential land uses. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in other mixed-use developments (e.g., cleaning solvents, pesticides for landscaping, and painting supplies). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials area reasonably anticipated to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and

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	California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. • Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. • Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials. • Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project. • Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: – The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel	local regulations. Any associated risk would be reduced through compliance with these standards and regulations. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant and no mitigation measures are required.

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	products, lubricants, solvents, and cleaning fluids. – The location of such hazardous materials. – An emergency response plan including employee training information. – A plan that describes the manner in which these materials are handled, transported and disposed. • Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects. • Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. • Avoid overtopping construction equipment fuel gas tanks. • During routine maintenance of construction equipment, properly contain and remove grease and oils. • Properly dispose of discarded containers of fuels and other chemicals.	
HAZ-2: Potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	MM-HAZ-1(b).	As described above, under HAZ-1, the Project would substantially comply with MM-HAZ-1(b). In addition, during construction, all potentially hazardous materials encountered and used at the Project Site would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. This ensures that potential risks associated with construction related activities are minimized. A preliminary endangerment assessment (PEA) for the Project was prepared by HMC on July 19, 2018 (Attachment E: *Environmental Assessments*). The PEA evaluated possible ingestion, inhalation, and dermal exposure routes of the contaminants at the Project Site to possible human receptors which included future residents, and occupational and construction workers. As indicated in the PEA, potential risks to residents,

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		visitors, and employees on the Project Site would be minimal during operation of the Project. While risks to construction workers would be minimal, the Project would include a Project Commitment for the preparation and enforcement of a Soil Management Plan (SMP) and a Groundwater Management Plan (GWMP). The SMP would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. The GWMP would include training and protocols for contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking. The Project Commitments of a SMP and GWMP would be included in the Project Plans. As indicated in the Phase I Environmental Site Assessment (ESA) (Attachment E: *Environmental Assessments*), given the age of the on-site structures (1986) it is unlikely that Asbestos Containing Materials (ACMs) are present is significant quantities. However, the Phase I ESA recommended that prior to any renovation or demolition activities an asbestos survey should be conducted. Based on the age of the on-site building, it is unlikely that LBP has been used on the Project Site in the past. However, given that lead may be present in other materials such as ceramic tile and fixtures, prior to any renovation or demolition activity, the Phase I ESA also recommended that a lead survey should be conducted of any suspect lead-containing materials (including paint) that are likely to be disturbed. To further minimize risks associated with ACMs and LBP, a Project Commitment would be implemented as part of the Project that would require that prior to demolition activities, an investigation for ACMs would be conducted and identified asbestos shall be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations. In addition, a Project Commitment would be implemented as part of the Project that would require that prior to demolition activities, an investigation for LBP would be conducted and any identified LBP would be abated in accordance with applicable City, State, and federal regulations.

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		The Project Commitments are as follows: • Project Commitment Hazard-1: A Soil Management Plan (SMP) shall be prepared that will provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils from historical operations that may be encountered at the Project Site during grading and excavation activities. These procedures would include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures. • Project Commitment Hazard-2: A Groundwater Management Plan (GWMP) shall be prepared that includes training and protocol procedures to contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking. • Project Commitment Hazard-3: Prior to demolition activities, an investigation for asbestos containing materials (ACMs) shall be conducted and identified asbestos shall be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations. • Project Commitment Hazard-4: Prior to demolition activities, an investigation for lead-based paint (LBP) shall be conducted and identified LBP shall be abated in accordance with applicable City, State, and federal regulations. Construction workers shall be properly trained in lead-related construction in order to avoid exposure of such workers to lead-containing material.

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HAZ-3: Potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school.	MM-HAZ-1(b).	As described above, under HAZ-1, the Project would substantially comply with MM-HAZ-1(b). In addition, during construction and operation, the Project would not emit or handle hazardous materials or substances other than those typically used in other mixed-use residential and commercial developments.
HAZ-4: Potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	MM-HAZ-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines; SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and 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: • Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. • Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor,	As part of the Phase I ESA, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. The databases searched as a result of Government Code Section 65962.5 are known as the "Cortese List" and include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency. No hazardous materials that may pose a risk at or to the Project Site were listed in the databases. Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment, and, this mitigation measure does not apply. The Project would use best management practices (BMPs) regarding potential soil and groundwater hazards. As described under MM-HAZ-2, potential risks to residents, visitors, and employees on the Project Site would be minimal during operation of the Project. However, to further minimize risks associated with ACMs and LBP, an investigation for ACMs would be conducted and any identified asbestos would be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations. In addition, prior to demolition activities, an investigation for LBP would be conducted and any identified LBP would be abated in accordance with applicable City, State, and federal regulations. The Project would include a commitment to the preparation and enforcement of a SMP and a GWMP that would provide safety guidance and protocols for contractors of potentially impacted soils or groundwater that may be encountered at the Project Site during construction. The commitment of the SMP and GWMP and investigation for ACMs and LBP on the Project Site would be included in the Conditions of Approval for the Project.

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

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	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	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	met for previous contamination at the site. • Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. • If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations. • Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. • Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. • Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
HAZ-5: Potential for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.	No mitigation.	No mitigation applies.
HAZ-6: Potential for a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.	No mitigation.	No mitigation applies.
HAZ-7: Potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	MM-TRA-5(b).	The Project already substantially conforms to this mitigation measure. The Project would not result in any significant traffic impacts. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LADOT during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and any evacuation routes would be maintained during construction and operation. Therefore, impacts would be less than significant and no mitigation measures are required.

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HAZ-8: Potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	MM-HAZ-8(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures 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, 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	This mitigation measure does not apply to the Project because the Project Site is located in a fully urbanized area and there are no wildlands in the vicinity, and is not near a wildland fire hazard. Furthermore, the Project is subject to regulatory compliance measures, such as adherence to Fire Code requirements, such as submitting a fire safety plan to the Lead Agency and local fire agency for their review and approval.

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	immediate vicinity of development in areas with high fire threat. • Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of 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		
HYD-1: Potential to violate any water quality standards or waste discharge requirements.	MM-HYD-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can	The Project already substantially conforms to this mitigation measure. The Project would comply with Los Angeles Municipal Code Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills and incorporate some of the text from below, such as: Storm Water Pollution Prevention Plans (SWPPP)s are commonly associated with construction stormwater permits, which are issued by the Regional Water Quality Control Board. As

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	and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. • Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. • Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. • Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. • Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. • Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: – U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act – Regional Walter Quality Control Board (RWQCB): Section 401	the Project is less than one acre, it does not require a SWPPP. However, the Project's construction activities would require grading, excavation, and foundation permits or approvals from the City of Los Angeles which would include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. The Project would be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standard. To facilitate this, the proposed stormwater Best Management Practice (BMP) would be bio-infiltration flow-through planters. The entirety of the building's roof drains would be diverted to the bioinfiltration flow-through planters and the overflow discharge would be discharged to North Broadway via a curb drain or parkway drain. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan to the City's Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

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	Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above. – California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW. • Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. • Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. • Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies. • Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. • Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. • Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous	

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	paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. • Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters. • Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel. • Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. • Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible. • If a proposed project has the potential to create a major new stormwater discharge to a water body with an	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.	
HYD-2: Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).	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. • 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,	Continual dewatering during operation of the Project would not occur. During construction of the Project, temporary dewatering could be necessary. However, construction-related dewatering activities would be temporary in nature and would not be of an extent that would substantially alter groundwater supplies. Construction-related dewatering, treatment, and disposal would be conducted in accordance with permitted requirements set forth by the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	new impervious surfaces, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. • Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	
HYD-3: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site.	MM-HYD-1(b).	As described above under HYD-1, the Project already substantially conforms to this mitigation measure. Furthermore, compliance with LAMC Chapter XI, Division 70 would ensure that the Project does not substantially alter the existing drainage pattern of the area surrounding the Project Site. LAMC Chapter IX, Division 70 addresses erosion control during grading, excavation, and fill activities, as well as the SUSMP, which addresses erosion control through peak-flow reduction and infiltration features. Therefore the impacts related to drainage pattern alteration and erosion would be less than significant.
HYD-4: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site.	MM-HYD-1(b).	As described above under HYD-1, the Project already substantially conforms to this mitigation measure. Furthermore, given that there are no waterbodies within or near the Project Site, flooding is not expected to occur on- or off-site. Therefore the impacts related to drainage pattern alteration and flooding would be less than significant.
HYD-5: Potential to substantially create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff.	MM-HYD-1(b).	The Project would be subject to the provisions of the LID Ordinance. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that expand the review of the SUSMP discussed above. Incorporation of these features would minimize the stormwater runoff from the Project Site. It can be reasonably anticipated, then, that the existing storm drain system has adequate capacity to accommodate flows from the Project Site. Therefore, impacts would be less than significant and no mitigation measures are required.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
HYD-6: Potential to otherwise substantially degrade water quality.	MM-HYD-1(b).	The Project already substantially conforms to this mitigation measure, because the Project is required to implement regulatory requirements, thus, water quality impacts associated with construction and operation of the Project would be less than significant. No mitigation measures are required.
HYD-7: Potential to place housing within a 100- year flood hazard area as mapped on a federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map.	No mitigation.	No mitigation applies.
HYD-8: Potential to place within a 100-year flood hazard area structures that would impede or redirect flood flows.	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: • 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	The Project already substantially conforms to this mitigation measure. FEMA's Flood Insurance Rate Map shows the Project Site is not within a 100-year flood hazard area. Therefore, no impact would occur and no mitigation measures are required.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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.	
HYD-9: Potential to expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.	MM-HYD-8(b).	According to information provided by the Federal Emergency Management Agency the Project Site property is not located in a 100- year flood area. Further, the Project Site is not located with a potential inundation area. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam and SCAG Mitigation Measure MM-HYD-8(b) would not apply.
HYD-10: Potential for inundation by seiche, tsunami, or mudflow.	MM-HYD-8(b).	The Project already substantially conforms to this mitigation measure. The Project Site is located approximately 14 miles east of the Pacific Ocean. Therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. The Project Site is not located in a Tsunami Hazard Area. The Project Site is located in an urbanized portion of the City of Los Angeles and is relatively flat. Thus, there is low potential for inundation by seiche, tsunami, or mudflow and SCAG and SCAG Mitigation Measure MM-HYD-8(b) would not apply.
Land Use and Planning	**Project – Level Mitigation Measures**	**Project Consistency/Notes**
LU-1: Potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	MM-LU-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an	The Project Site has a General Plan Land Use Designation of Regional Commercial. The existing C2-2 and [Q]C2-2 zoning designations are consistent with this designation. The Project would not involve a General Plan amendment or zone change. The Project is consistent with the existing General Plan Land Use designation of Regional Commercial as it proposes a residential and commercial mixed-use project within close proximity to a variety of public transit options. The Project would include residential, commercial, and office uses that would provide much needed housing, business, and job opportunities in a transit friendly location. The Project would be consistent with the applicable objectives and policies set forth in the City's plans and zoning including the General Plan, Community Plan, Planning and Zoning Code, Los Angeles Green Building Code, and the Walkability

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency: • Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.	Checklist. Therefore, the Project would not result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project and SCAG Mitigation Measure LU-1 would not apply.
LU-2: Potential to physically divide an established community.	MM-LU-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consider alignments within or adjacent to existing public rights-of-way. • Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. • Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). • Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods.	The Project would not cause any permanent street closures or block access to any surrounding land use. Since the Project would be developed within a long-established developed area along an existing street grid system, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Thus, SCAG Mitigation Measure MM-LU-2(b) would not apply.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: – Alignment shifts to minimize the area affected. – Reduction of the proposed right-of-way take to minimize the overall area of impact. – Provisions for bicycle, pedestrian, and vehicle access across improved roadways. • Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project. • Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.	
LU-3: Potential to conflict with any applicable habitat conservation plan or natural community conservation plan.	See MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), MM-BIO-5(b), and MM-BIO-6(b).	As described above under BIO-6, the Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Thus, SCAG Mitigation Measures MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), MM-BIO-5(b), and MM-BIO-6(b) would not apply.
Mineral Resources		
MIN-1: Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.	MM-MIN-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that 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 Project Site is fully developed and no oil wells are present. There are no oil extraction operations and drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses. Furthermore, as required by City Ordinance 181,519 (Waste Hauler Permit Program), Project construction waste would be hauled by permitted haulers and taken only to City-certified construction and demolition (C&D) processing

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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: • 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.	facilities that are monitored for compliance with recycling regulations. Given the Project's compliance with the required standards, the Project would be in compliance with SCAG Mitigation Measure MM-MIN-1(b)..

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
MIN-2: Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.	MM-MIN-1(b).	There are no oil extraction operations and drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, SCAG Mitigation Measure MM-MIN-1(b) would not apply.
Noise		
NOISE-1: Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	MM-NOISE-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor's Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other	Under PRC Section 21155.1, transit priority projects are not required to evaluate effects of noise. The Project would schedule construction activities consistent with the allowable hours pursuant to the Los Angeles Municipal Code (between 7:00 a.m. to 9:00 p.m. Monday through Friday and between 8:00 a.m. to 6:00 p.m. Saturdays and National Holidays). When construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, the Project would provide the appropriate required notifications and list of noise protective measures. To minimize construction and operational noise levels, the Project would include a Project Commitment which would include implementation of best management practices. The Project Commitment is as follows: **Project Commitment-NOISE-1:** The Project Applicant and all contractors shall include the following best management practices in contract specifications: • Install temporary noise barriers or noise curtains during construction to protect

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	comparable measures identified by the Lead Agency: • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to	sensitive receptors from excessive noise levels. • Construction haul truck and materials delivery traffic will avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences. • Comply with the State's anti-idling regulation, codified in Title 13 California Code of Regulations (CCR) Section 2485, which applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This regulation does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time, with certain exception for vehicles where idling is a necessary performance activity such as for concrete trucks. • The construction contractor will locate construction staging areas away from noise-sensitive uses. • The construction contractor will locate fixed/stationary construction equipment, such as generators, compressors, and cement mixers as far as possible from noise-sensitive uses. • Impact pile drivers will not be used. If piles are required, the use of quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, will be utilized where geological conditions permit their use. Noise shrouds will be used when necessary to reduce noise of pile drilling/driving. • Impact tools will be hydraulically or electrically powered, to the extent such tools are commercially available in the City of Los Angeles, to avoid noise associated with compressed air exhaust from pneumatically powered tools. • Construction equipment will be equipped with mufflers and/or best available noise suppression devices that comply with manufacturers' requirements. • Notify neighbors and occupants within 300 feet of the Project construction area at least 30 days in advance of groundbreaking for construction.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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.	• Designate an on-site construction complaint and enforcement manager for the Project. Post a sign at the construction site that includes permitted construction days and hours, and contact phone number for the job site to report noise complaints. • Install permanent noise barriers and sound-attenuating features for operational stationary sources of noise such as generators and heating, ventilation and air conditioning (HVAC) equipment. Given the Project's compliance with the required standards, best management practices, and with incorporation of the Project Commitment listed above, the Project would be in substantial compliance with SCAG Mitigation Measure MM-NOISE-1(b).

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• Use noise barriers to protect sensitive receptors from excessive noise levels during construction. • Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls. • Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. • Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. • Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.	
NOISE-2: Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	MM-NOISE-1(b). **MM-NOISE-2(b)**: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead 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	Under PRC Section 21155.1, transit priority projects are not required to evaluate effects of vibration. Nonetheless, the Project would substantially conform to this mitigation measure. as required in Project Commitment Noise-1, the Project would not use impact pile drivers. If piles are required, the use of quiet pile driving techniques will be used, which would minimize noise and vibration. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, the Project would be in substantial compliance with SCAG Mitigation Measure MM-NOISE-2(b).

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	comparable measures identified by the Lead Agency: • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. • For projects where pile driving 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.	
NOISE-3: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	MM-NOISE-1(b).	Under PRC Section 21155.1, transit priority projects are not required to evaluate effects of vibration. Nonetheless, as discussed in NOISE-1 above, the Project would substantially conform to this mitigation measure. Additionally, with respect to Project-related traffic, when compared to the existing vehicle trips at the two nearest intersections to the Project Site that were studied in the Transportation Impact Study prepared by Gibson Transportation Consulting, Inc., 2018, the Project would not result in a permanent perceptible increase in noise levels without the Project. Based on the data in the Transportation Impact Study, under existing (2018) conditions, the traffic volumes at the intersections nearest to the Project

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
		Site would be approximately 3,272 vehicle trips at intersection number 6 (Broadway and College Street) during the PM peak hour and 2,718 vehicle trips at intersection number 8 (Broadway and Bernard) during the PM peak hour. The Project would generate approximately 672 net new vehicle trips per day (refer to Table 8 of the Transportation Impact Study). Therefore, even conservatively assuming that all Project trips would occur at these intersections nearest to the Project Site, it is clear that the Project would not double the traffic volumes on any roadway segment in the vicinity of the Project Site and, as such, the Project would not increase roadway noise levels by 3 dBA. A 3 dBA change in noise level is considered to be a barely perceivable difference, and requires a doubling (or halving) of sound energy (i.e., in the case of traffic noise, a 3 dBA increase in noise level generally requires a doubling of the traffic volume). Thus, traffic from the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. New stationary sources of noise associated with the Project, such as mechanical HVAC equipment would be installed for the proposed building. The design of this equipment would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. Thus, because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by 5 dBA on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Furthermore, the Project mechanical HVAC equipment would incorporate standard design techniques that would minimize noise such as manufacturer provided sound enclosures and parapets, screens, or other similar barriers to shield from view. Therefore, stationary noise source levels associated with the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
NOISE-4: Result in a substantial temporary or periodic increase in ambient noise levels in the	MM-NOISE-1(b).	The Project already substantially conforms to this mitigation measure, as described under NOISE-1 through NOISE-3.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
project vicinity above levels existing without the project.		
NOISE-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in the exposure of people residing or working in the project area to excessive noise levels.	No mitigation.	No mitigation applies.
NOISE-6: For a project within the vicinity of a private airstrip, result in the exposure of people residing or working in the project area to excessive noise levels.	No mitigation.	No mitigation applies.
Population, Housing, and Employment		
PHE-1: Potential to induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	MM-LU-1(b).	The Project already substantially conforms to this mitigation measure. The Project would provide up to 178 residential units and 36,814 square feet of commercial and office uses which would generate new employment on the Project Site. Based on an average household size of 2.43 per unit which reflects the average household size in the Citywide Person Per Household factor for multi-family units as published in the 2016 Census American Community Survey the Project's 178 dwelling units would generate a direct population increase of approximately 433 people. Based on employment generation factors of 0.00271 for commercial uses and 0.00479/sf for office uses (LAUSD Developer Justification Study for LAUSD March 2014), the Project would generate 165 new employees. The addition of 433 residents represents a 0.01 percent increase in resident population estimates for the City of Los Angeles in 2017 (3,999,759 persons per 2017 Census Data), and 0.009 percent of the estimated population of 4,609,414 persons in the City of Los Angeles in 2040 (SCAG 2016-2040 RTP). The increase in employment would represent 0.009 percent of the current labor force for the City of Los Angeles as of May 2018 (2,071,800 jobs per the State of California Employment and Development Department). The Project would provide a 0.0076 percent increase of the projected 2,169,114 jobs in 2040 (SCAG 2016-2040 RTP). This increase would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population or

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
		employment. Because the Project is located within a designated City of Los Angeles Transit Priority and within an area meeting SCAG's definition of a high quality transit area, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies. As such, population and employment growth associated with the proposed Project would be less than significant and no mitigation measures are required.
PHE-2: Potential to displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere.	MM-PHE-2(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction's housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. • Prioritize the use existing ROWs, wherever feasible. • Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.	The Project Site is currently developed with commercial uses, and does not contain any existing housing. Therefore, development of the Project would not displace any existing housing and would not require construction of replacement housing. No impact would occur and no mitigation measures are required.
PHE-3: Potential to displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	MM-PHE-2(b).	The Project Site is currently developed with commercial uses, and does not contain any existing residential uses. Therefore, development of the Project would not displace any existing residents and would not require construction of replacement housing. No impact would occur and no mitigation measures are required.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Public Services		
PS-1: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency response services.	Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b). 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: • 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-	The Project already substantially conforms to this mitigation measure. The Project would also be subject to compliance with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the City of Los Angeles Municipal Code and the Los Angeles Fire Department (LAFD), to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the Project pursuant to LAFD review and guidance include the following: • Building Design: Fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet code requirements. • Fire Safety Features: Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system. • Emergency Safety Provisions: Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g. floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services. • LAFD Access: Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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.	In addition, the City of Los Angeles requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. The Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that it would require construction of new fire facilities. Even if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Project area is highly developed, and the site of a fire station or expansion of a fire station would likely be on an infill lot that would likely be less than an acre in size.
PS-2: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public protective security services.	Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b). 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	The Project already substantially conforms to this mitigation measure. The Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	Agency, taking in to account project and site-specific considerations as applicable and feasible, including: • Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel. • 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.	
PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other	Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b). MM-PS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation	Schools: Payment of appropriate school fees to LAUSD is required by law and considered full mitigation, impacts would be less than significant and no mitigation measures are required.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
performance objectives for schools services.	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: • 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.	
Recreation		

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
REC-1: Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	MM-REC-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures capable of avoiding or reducing significant impacts on the use of existing neighborhood and regional parks or other recreational facilities to ensure compliance with county and city general plans and the Quimby Act, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: – Increasing the accessibility to natural areas for outdoor recreation. – Promoting infill development and redevelopment to revitalize existing communities. – Utilizing “green” development techniques.	The Project already substantially conforms to this mitigation measure. The Project would provide 43,079 square feet of open space and recreational amenities. The Project applicant would be responsible for meeting any parkland dedication or fee requirements pursuant to the Quimby Act and applicable LAMC requirements, as necessary.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– Promoting water-efficient land use and development. – Encouraging multiple uses. – Including trail systems and trail segments in General Plan recreation standards. • Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQTA. • Where construction or expansion of recreational facilities is included in the project or required to meet public park service ratios, require implementation of Mitigation Measures MM-AES-1(b), 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.	
REC-2: Potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	See MM-REC-1(b).	The Project would provide 43,079 square feet of open space and recreational amenities. The Project has been designed to include a public ground floor plaza with outdoor dining areas, landscaping and a number of amenities for residents including a dog run, a recreation room, a pool and residential amenities on the 4th-6th floor and the rooftop. The Project would also include 45 on site trees.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
		These recreational amenities would help relieve stress on the City's existing park and recreational system. The Project does not include, nor would it necessitate, a park or public recreational facility component, the construction of which could have an adverse environmental impact. Therefore, no impact would occur and no mitigation measures are required.
Transportation, Traffic, and Safety		
TRA-1: Potential to conflict with the established measures of effectiveness for the performance of the circulation system, by increasing the daily VMT, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	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: • 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	The Project already substantially conforms to this mitigation measure. Based on the Transportation Impact Study prepared for the Project by Gibson Transportation in September 2018, contained in Attachment L: *Los Angeles Department of Transportation Technical Memorandum and Traffic Report*, the Project would have a less than significant impact on the street system in the vicinity of the Project. The Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. The Project would include a Construction Management Plan as a Project Commitment that would include measures to ensure pedestrian safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use of flag persons, rerouting, and installation of protection barriers). **Project Commitment TRAF-1:** The features of the Construction Management Plan shall include, but not be limited to, the following elements, as appropriate: • Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation. • Prohibition of construction worker or equipment parking on adjacent streets. • Temporary pedestrian, bicycle, and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to ensure traffic safety on public roadways. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety.). • Temporary traffic control during all construction activities adjacent to public rights-

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: – Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement. – Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document). – Signage and striping onsite to encourage bike safety. – Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials. – Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan. – Direct transit sales or subsidized transit passes. – Guaranteed ride home program. – Pre-tax commuter benefits (checks). – On-site car-sharing program (such as City Car Share, Zip Car, etc.) – On-site carpooling program. – Distribution of information concerning alternative transportation options. – Parking spaces sold/leased separately. – Parking management strategies; including attendant/valet parking and shared parking spaces. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas.	of-way to improve traffic flow on public roadways (e.g., flag persons). • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets. • Potential sequencing of construction activity to reduce the amount of construction-related traffic on arterial streets. • Containment of construction activity within the Project Site boundaries. • Prohibition of construction-related vehicles/equipment parking on surrounding public streets. • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate. • Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible. Thus, with the Project' s Commitment of a Construction Management Plan, construction and operation of the Project would not result in a significant impact to the performance of the circulation system. Therefore, impacts would be less than significant and no mitigation measures are required.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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. – Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. • Public Involvement: – Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services. • Transit and Multimodal Impact Fees: – Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. – Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. • System Monitoring:	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– 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.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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);	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– Use parking pricing to discourage private vehicle use, especially at peak times; – Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; – Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times; – Encourage shared parking programs in mixed-use and transit-oriented development areas. • Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: – Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking; – Encourage special event center operators to advertise and offer discounted transit passes with event tickets; – Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking; – Promote the use of bicycles by providing space for the operation of valet bicycle parking service. • Parking "Cash-out" Program: – Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use. • Pedestrian and Bicycle Promotion: – Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	pedestrian and bicycle modes of transportation. • Fleet Replacement: – Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.	
TRA-2: Potential to conflict with an applicable congestion management program, including, but not limited to, VMT and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways.	MM-TRA-2(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions: • Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: – Advocate for a regional, market-based system to price or charge for auto trips during peak hours.	The Project already substantially conforms to this mitigation measure. A Construction Management Plan would be implemented as a Project Commitment as described above.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. – Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. – Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation. – Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. • Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency: – A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– Any heavy equipment brought to the construction site shall be transported by truck, where feasible. – No materials or equipment shall be stored on the traveled roadway at any time. – Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion. – All equipment shall be equipped with mufflers. – Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors. – Promote "least polluting" ways to connect people and goods to their destinations. • Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency: – Ensure transportation centers are multi-modal to allow transportation modes to intersect. – Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail. – To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges. – Focus transit resources on high-volume corridors and high-boarding	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	destinations such as colleges, employment centers and regional destinations. – Coordinate schedules and routes across service lines with neighboring transit authorities. – Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles). – Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so. – Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles. – Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets. – Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible. • Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: – Ensure transit stops and bus lanes are safe, convenient, clean and efficient.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– 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.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	route to popular tourist destinations or shopping and business centers. • Work with existing shuttle service providers to coordinate their services. • Facilitate employment opportunities that minimize the need for private vehicle trips, including: – Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations. – Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate. • Enforce state idling laws for commercial vehicles, including delivery and construction vehicles. • Organize events and workshops to promote GHG-reducing activities. • Implement a Parking Management Program to discourage private vehicle use, including: – Encouraging carpools and vanpools with preferential parking and a reduced parking fee. – Institute a parking cash-out program. – Renegotiate employee contracts, where possible, to eliminate parking subsidies. – Install on-street parking meters with fee structures designed to discourage private vehicle use. – Establish a parking fee for all single-occupant vehicles. • Work with school districts to improve pedestrian and bicycle to schools and restore school bus service. • Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities. • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency.	

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: – Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. – Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. – Scheduling of truck trips outside of peak morning and evening commute hours. – Limiting of lane closures during peak hours to the extent possible. – Usage of haul routes minimizing truck traffic on local roadways to the extent possible. – Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. – Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. – Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals,	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. – Storage of construction materials only in designated areas. – Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. • Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. • Enhance emergency preparedness awareness among public agencies and with the public at large. • 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.	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
TRA-6: Potential to result in conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	No mitigation.	No mitigation applies.
Utilities and Service Systems		
USS-1: Potential to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	No mitigation.	No mitigation required.
USS-2: Potential to require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	No mitigation.	No mitigation required.
USS-3: Require or result in construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	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. Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant impacts on the use of	The Project already substantially conforms to this mitigation measure. Due to the largely impervious existing Project Site conditions and the increase in the amount of landscaping and other pervious surfaces, the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity. Therefore, the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities. See MM-HYD-5(b).	
USS-4: Have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements.	MM-USS-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter – Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and applicable County, City or other Local provisions. Such measures may include the following or other comparable measures identified by the Lead Agency: • 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	The Project already substantially conforms to this mitigation measure. To ensure that the Project reduces its projected water demand to the extent feasible, the Project would be required to comply with Ordinance No. 170,978 (Landscape Ordinance), which imposes numerous water conservation measures in landscaping, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). Additionally, the Project would be required to design building and landscaping to achieve 25 percent less water usage than the average household in the region as part of the CEQA exemption process. Specifically, the Project's water use would beat least 25 percent below the SCAG average household use in the region (Attachment C*: Energy and Water Efficiency Compliance Report*). The Project would achieve its water efficient through multiple measures including high efficiency water using appliances such as clothes washers and dishwashers, low flow fixtures and faucets, and efficient irrigation systems clothes washers, dishwashers, and irrigation system. The Project would include drought-tolerant native landscaping plantings, promote drought resistant landscaping, promote water conservation best practices, increase permeable areas, and avoid continue dewatering. Therefore, no mitigation measures are required.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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.	
USS-5: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's commitments.	No mitigation.	No mitigation applies.
USS-6: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	MM-USS-6(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such	The Project already substantially conforms to this mitigation measure. The Project would comply with the City of Los Angeles Green Building Code which requires the recycling and/or salvaging of 65 percent of non-hazardous construction and demolition waste. Project construction waste would be hauled by permitted haulers and taken only to City-certified construction and demolition (C&D) processing facilities that are monitored for compliance with recycling regulations. Project-generated C&D waste would represent a very small percentage of the waste disposal capacity in the region and as described above, in compliance with City Ordinance 181,519, the C&D waste would be further minimized. There are 10 Class III landfills in Los Angeles County which collectively accept the majority of solid waste generated. The daily average disposal

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	measures may include the following or other comparable measures identified by the Lead Agency: • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, 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 disposed of regionally, considering distance to disposal site.	rate for in-county waste across the 10 Class III landfills is 16,456 tons per day(tpd) and there is an estimated remaining capacity (as of December 31, 2016) of 103.18 million tons. As shown in Attachment J: *Estimated Solid Waste Generation at the Project Site*, the estimated solid waste at the Project site is analyzed based on solid waste generation factors from the California Integrated Waste Management Board (CIWMB). The Project could generate approximately 843 lbs/day (0.422 tons/day or 154.04 tons/year) of solid waste beyond existing conditions. The Project's 0.422 tons/day would comprise approximately 0.00003 percent of the total Los Angeles County residual daily capacity of 16,456 tons per day. As such, the solid waste generated by the Project would be an insignificant impact to the landfill capacity and could be accommodated by the County's available regional landfills. In addition, waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's Zero Waste Plan goal of achieving a 90 percent solid waste diversion rate by 2025.

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required. – Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. – Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. – Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events 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).	

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	– 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.	
USS-7: Potential to comply with federal, state, and local statutes and regulations related to solid waste.	No mitigation.	No mitigation applies.

5.0 Project Commitments: 942 North Broadway

5.1 Air Quality

1. **Project Commitment-Air-1:** The Project Applicant and all contractors to include the following best management practices in contract specifications:

   - Ensure that all construction equipment is properly tuned and maintained in accordance with manufacturer specifications.
   - To the extent available on the Project Site, utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators.
   - 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 during construction of the Project.
   - Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines rated at 50 horsepower or greater.

5.2 Cultural Resources

2. **Project Commitment Cultural-1:** In order to avoid impacts to the Zanja Madre, a historical resource, the Project has been designed to include a permanent setback area, both horizontally and vertically, around the mapped and possibly preserved in place Zanja segment that may be located on the northeast corner of the Project Site. The permanent setback area includes a 5-foot buffer on each side of the conduit as it is mapped on an 1890 LADWP as-built drawing of the Project Site. The mapped location of the permanent setback area is included in the Project plans and design drawings.

   - The permanent setback area includes an Above Ground Activities Implementation area that restricts mechanical excavation or compacting surface treatment or landscaping in this area. The plans have designed the permanent setback to be leveled to no more than an elevation of 305.15 feet throughout the permanent setback area. The Project plans also include landscaping in the area that is drought tolerant landscaping and thus does not require heavy watering or have extensive root systems that could disturb or degrade the condition of the Zanja Madre segment in this location.
   - Excavation within the Above Ground Activities Implementation area, landscaping, and any necessary paving will be conducted with non-vibratory hand tools. Accordingly, if vibration levels monitored for the Project during any construction activities over the permanent setback area meet or exceed 0.08 PPV, construction activity shall immediately cease and measures necessary to ensure vibration level is not exceeded shall be implemented prior to resuming construction activities. Qualified vibration monitors will be on-site working with the qualified archaeological monitor to ensure implementation and to identify any potential impacts during hand digging or landscaping

within the permanent setback area. Any paving stones required should be set in sand or decomposed granite materials that do not require compaction. During construction, vibration monitors shall be placed within at least 10 feet of the permanent setback area and shall be located directly between any construction activity and the permanent setback area. If support of the plaza or a walkway is required, it will be cantilevered over the permanent setback area, and supported by piles on either side of it. The installation of these piles will be in accordance with Project design and will avoid the setback area including its buffer zone. Moreover, during any surface construction activities that occur directly over the permanent setback area for the construction of landscaped Project areas, vibration monitoring will be conducted to ensure no damage to the potential Zanja is caused by any such construction activity.

- The Project design will include a Tieback and Shoring Limited Exception Implementation area for the shoring of the subterranean parking foundation wall in order to provide support for the shoring. As shoring will be necessary, a 20-foot deep vertical permanent setback area is established where shoring tiebacks are prohibited. The vertical extent of the permanent setback and buffer ends 20 feet below at the elevation of adjacent Capitol Milling. The 20-feet depth includes the entire 3-foot diameter conduit at a potential depth of up to 15-feet from the base of the conduit plus a 5-foot buffer below it.

No other Project construction activities will be permitted within the permanent setback area.

All subsurface operations, including the installation of piles will be monitored by the qualified archaeologist in order to ensure adherence to the Project design plans. The monitor will conduct worker training prior to the initiation for ground-disturbing activities in order to inform workers of the types of resources that may be encountered and advise them of the proper avoidance of such resources. Project plans, Project commitments, this report and testing results will be provided to the qualified archaeologist in advance of construction. Project plans and Project commitments will be provided to any construction personnel that could be working in this area. The construction contractor will use a qualified archaeological monitor, working under the supervision of a qualified archaeological Principal Investigator, during ground disturbing activities. These activities include but are not limited to, demolition of pavement, foundations, footings, trenching, grading, installation of tie-backs, piling, landscaping, and over excavation within the Project Site. The qualified archaeologist will conduct worker training prior to the initiation for ground-disturbing activities in order to inform workers of the types of resources that may be encountered and advise them of the proper handling of such resources. The archaeological monitor will have the authority to redirect construction equipment in the event potential archaeological resources are encountered. In the event archaeological resources are encountered, the Applicant and the City will be notified immediately and work in the vicinity of the discovery will halt until appropriate treatment of the resource, is determined by the qualified archaeological Principal Investigator in accordance with the provisions of CEQA.

5.3 Hazards

3. **Project Commitment Hazard-1**: A Soil Management Plan (SMP) shall be prepared that will provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils from historical operations that may be encountered at the Project Site during grading and excavation activities. These procedures would include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures.

4. **Project Commitment Hazard-2:** A Groundwater Management Plan (GWMP) shall be prepared that includes training and protocol procedures to contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking.

5. **Project Commitment Hazard-3:** Prior to demolition activities, an investigation for asbestos containing materials (ACMs) shall be conducted and identified asbestos shall be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations.

6. **Project Commitment Hazard-4**: Prior to demolition activities, an investigation for lead-based paint (LBP) shall be conducted and identified LBP shall be abated in accordance with applicable City, State, and federal regulations. Construction workers shall be properly trained in lead-related construction in order to avoid exposure of such workers to lead-containing material.

5.4 Noise

7. **Project Commitment-NOISE-1**: The Project Applicant and all contractors shall include the following best management practices in contract specifications:

    - Install temporary noise barriers or noise curtains during construction to protect sensitive receptors from excessive noise levels.
    - Construction haul truck and materials delivery traffic will avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences.
    - Comply with the State's anti-idling regulation, codified in Title 13 California Code of Regulations (CCR) Section 2485, which applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This regulation does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time, with certain exception for vehicles where idling is a necessary performance activity such as for concrete trucks.

- The construction contractor will locate construction staging areas away from noise-sensitive uses.
- The construction contractor will locate fixed/stationary construction equipment, such as generators, compressors, and cement mixers as far as possible from noise-sensitive uses.
- Impact pile drivers will not be used. If piles are required, the use of quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, will be utilized where geological conditions permit their use. Noise shrouds will be used when necessary to reduce noise of pile drilling/driving.
- Impact tools will be hydraulically or electrically powered, to the extent such tools are commercially available in the City of Los Angeles, to avoid noise associated with compressed air exhaust from pneumatically powered tools.
- Construction equipment will be equipped with mufflers and/or best available noise suppression devices that comply with manufacturers' requirements.
- Notify neighbors and occupants within 300 feet of the Project construction area at least 30 days in advance of groundbreaking for construction.
- Designate an on-site construction complaint and enforcement manager for the Project. Post a sign at the construction site that includes permitted construction days and hours, and contact phone number for the job site to report noise complaints.
- Install permanent noise barriers and sound-attenuating features for operational stationary sources of noise such as generators and heating, ventilation and air conditioning (HVAC) equipment.

5.5 Transportation

8. **Project Commitment TRAF-1**: The features of the Construction Management Plan shall include, but not be limited to, the following elements, as appropriate:

    - Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
    - Prohibition of construction worker or equipment parking on adjacent streets.
    - Temporary pedestrian, bicycle, and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to ensure traffic safety on public roadways. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety.).
    - Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons).
    - Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.

- Potential sequencing of construction activity to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition of construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.