CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Sustainable Communities Project CEQA Exemption

639 La Brea Project

Case Number: ENV-2019-1736-SCPE

Project Addresses: 623-671 South La Brea Avenue, Los Angeles, California 90036

Community Plan Area: Wilshire

Council District: 4 - Ryu

Project Description: The Project Site occupies approximately 47,323 square feet (1.08 acres) and is currently developed with 34,268 square feet of commercial/retail and medical office uses. The Proposed Project includes the demolition of the existing commercial buildings and the development of an 8-story mixed-use building with a height of approximately 101 feet and 10 inches in height at the top of the roof parapet (122 feet to the top of the rooftop mechanical equipment and structures), with 121 residential dwelling units, 125 hotel rooms, and approximately 13,037 square feet of restaurant space ("Proposed Project"). Of the 121 dwelling units, 14 units would be restricted for Extremely Low Income households, which is equivalent to 11% of the total residential units. The Proposed Project would provide 192 vehicle parking spaces within two subterranean levels. The Project would also provide 139 bicycle parking spaces (including 108 long-term spaces and 31 short-term spaces). The Proposed Project would provide approximately 10,256 square feet of open space. The Proposed Project would include 201,123 square feet of total floor area resulting in a floor area ratio (FAR) of 4.25:1.

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

PREPARED BY:
Parker Environmental Consultants

APPLICANT:
La Brea Bliss, LLC

November 2019*

**A previous version of this Sustainable Communities Project CEQA Exemption (SCPE) was prepared and dated November 2019. The previous version included plans (Figure 5-16) from a prior iteration of the proposed project. This revised SCPE includes the correct plans, dated September 24, 2019 (Figures 5-16), reflecting the currently proposed project as detailed in the Project Description. No other material or analytical changes were made to this document.*

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1.0 Project Description

1.1 Project Location

The Project Site is located at 623-671 South La Brea Avenue in the City of Los Angeles, California and is comprised of twelve contiguous parcels legally described as Lot 38 through Lot 48, and a portion of Lot 49, of Tract 5273. The lots total approximately 47,323 square feet or 1.08 acres. The Project Site is located within the boundaries of the Wilshire Community Plan area. The Project Site's location within the City of Los Angeles and the greater Los Angeles region is depicted in Figure 1, Project Location Map.

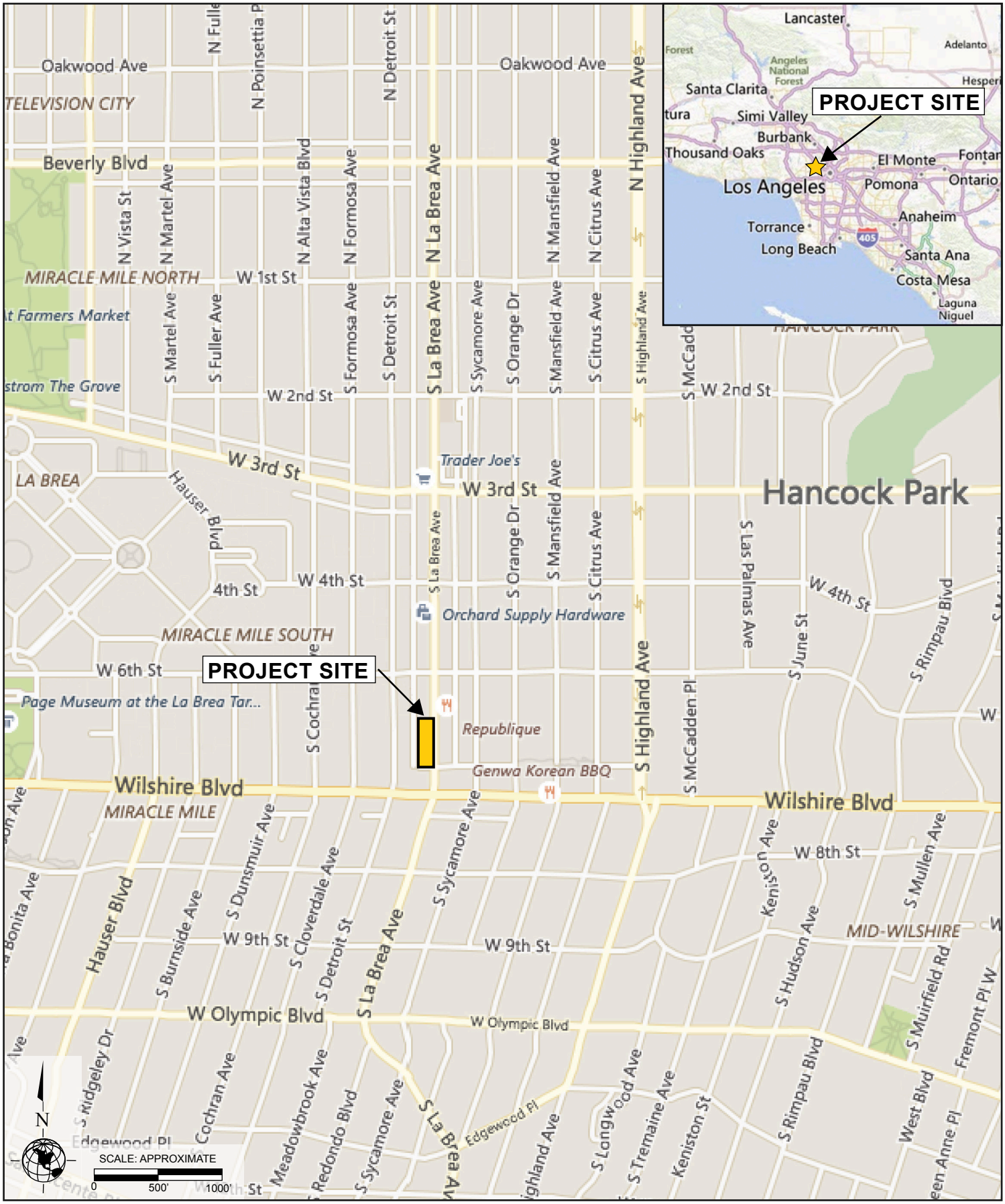
1.2 Existing Conditions

The Project Site is located in the C2-1 zone. The General Plan land use designation for the Project Site is General Commercial. Figure 2, Zoning and General Plan Land Use Designations, shows the existing zoning and land use designations on the Project Site and in the surrounding area. The Project Site fronts approximately 451 feet along the west side of South La Brea Avenue and is currently developed with five buildings consisting of two vacant building and three occupied buildings. The occupied buildings include a fabric shop, a printing shop, and an urgent care/medical office use. Based on Los Angeles County Assessor data, the existing site is developed with approximately 34,268 square feet of building area. An aerial photograph identifying the Project Site and its surrounding land uses is depicted in Figure 3. Photographs of the Project Site and the surrounding land use shown in Figure 4 and Figure 5, respectively. The Project Site's property addresses, APN and land uses are summarized in Table 1, Summary of the Project Site Area.

Table 1
Summary of Project Site Area

Addresses	*APN*	*Existing Land Use*
623 and 625 South La Brea	*5508007018*	*2,400 sf vacant commercial building*
627 and 629 South La Brea Avenue	*5508007019*	*Approx. 4,040 sf One-Story Commercial Building (Sharp Printing)*
631 South La Brea Avenue	*5508007020*	*Surface Asphalt Parking*
633, 635, 635 ½ and 637 South La Brea Avenue	*5508007021*	*Approx. 6,748 sf Two-Story Medical Office Building (La Brea Urgent Care/The Sleep Institute)*
639, 641, 643, 645, 647, 649, 651, 653, and 655 South La Brea Avenue	*5508007022*	*Approx. 17,080 SF Two-Story Commercial/Retail Building (Mood Fabrics)*
659 and 661 South La Brea Avenue	*5508007023*	*4,000 sf vacant commercial building*
665, 667, 669 and 671 South La Brea Avenue	*5508007901*	*Area Currently Fenced and Under Construction (MTA Wilshire and La Brea Station)*

Sources: City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed December 2016.
M&G Civil Engineering and Land Surveying, ALTA/ACSM Land Title Survey, October 27, 2016.
Parker Environmental Consultants, 2019.



Source: Bing Maps, 2019.

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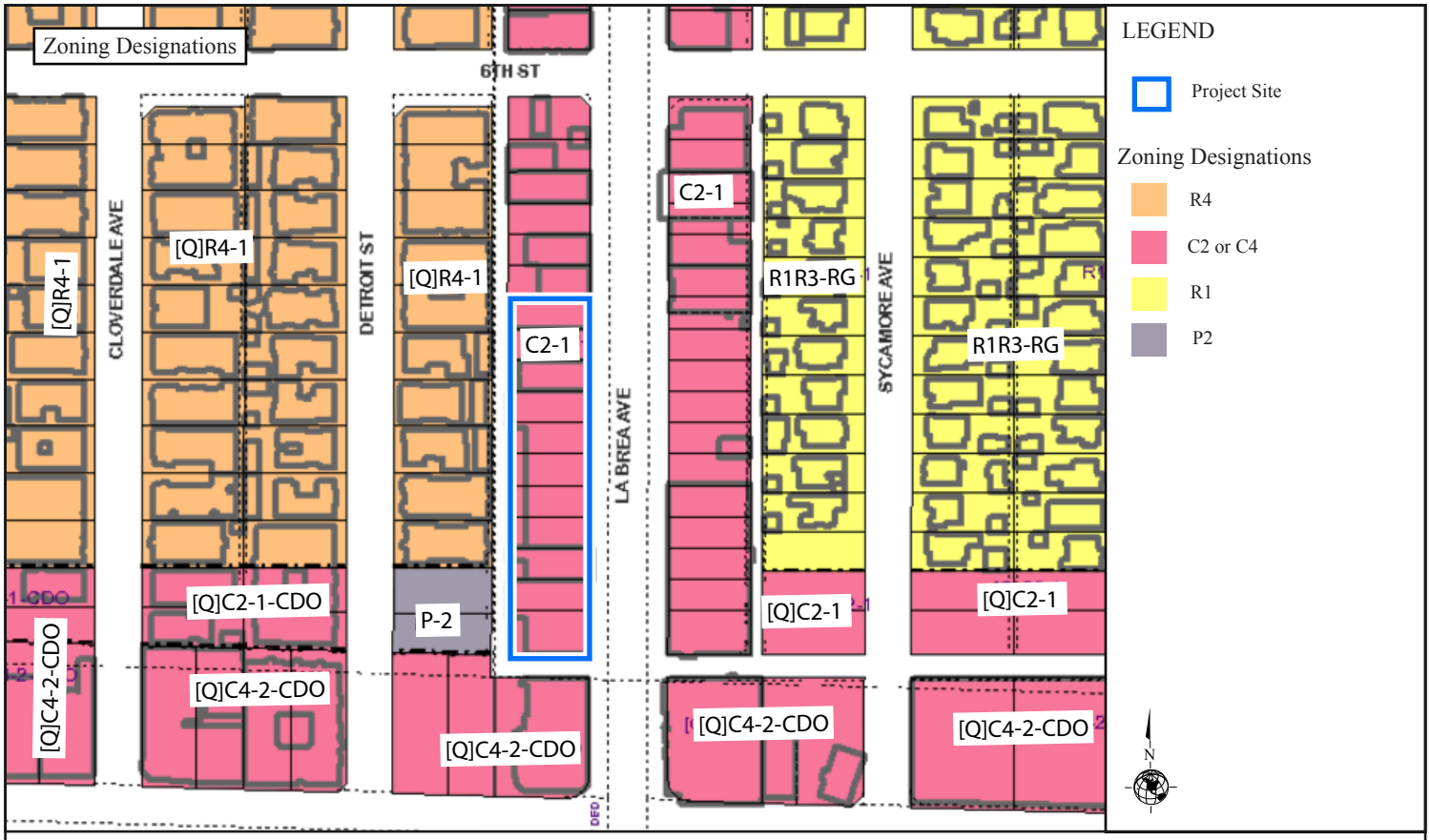
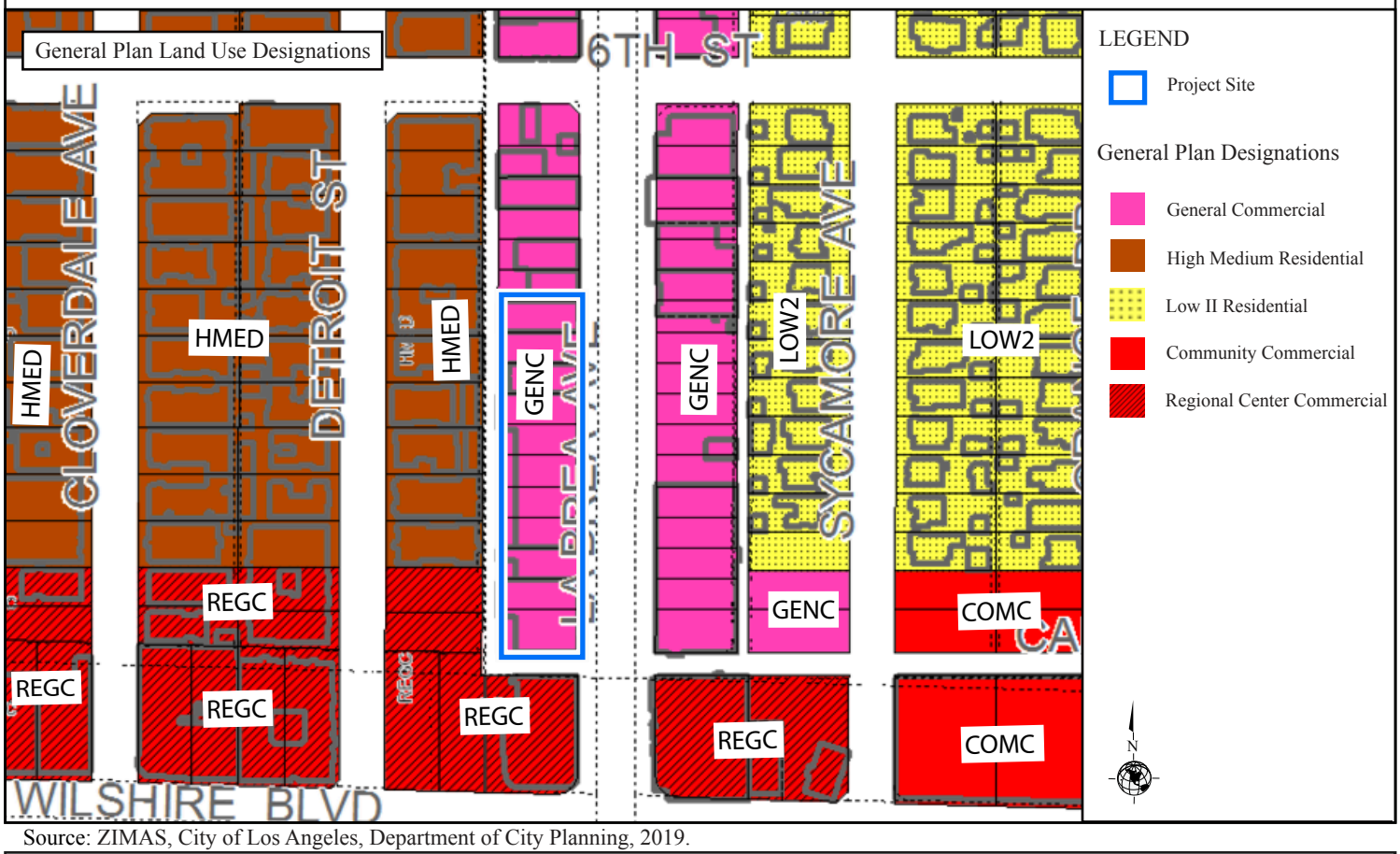
Figure 1
Project Location Map





Source: ZIMAS, City of Los Angeles, Department of City Planning, 2019.

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Figure 2
Zoning and General Plan Land Use Designations

Source: Google Earth, Aerial View, 2016

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Figure 3
Aerial Photograph of the Project Vicinity

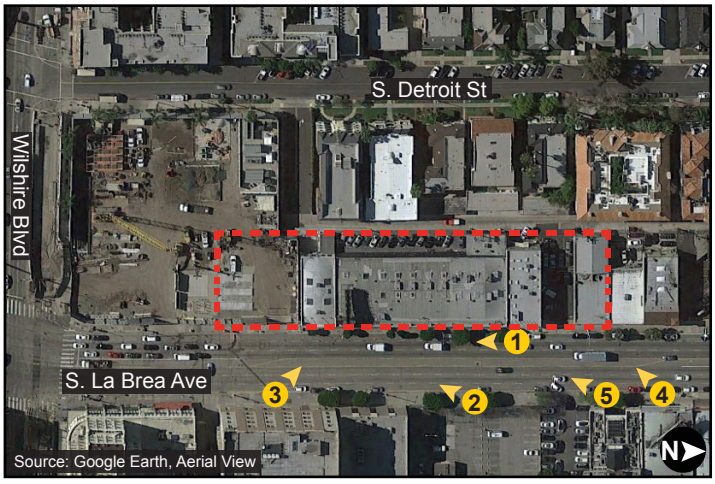
View 1: From the west side of La Brea Avenue, looking south at the Project Site.

View 2: From the east side of La Brea Avenue, looking southwest at the Project Site.

View 3: From the east side of La Brea Avenue, looking northwest at the Project Site.

View 4: From the east side of La Brea Avenue, looking southwest at the Project Site.

View 5: From the east side of La Brea Avenue, looking southwest at the Project Site.



Source: Parker Environmental Consultants, 2017

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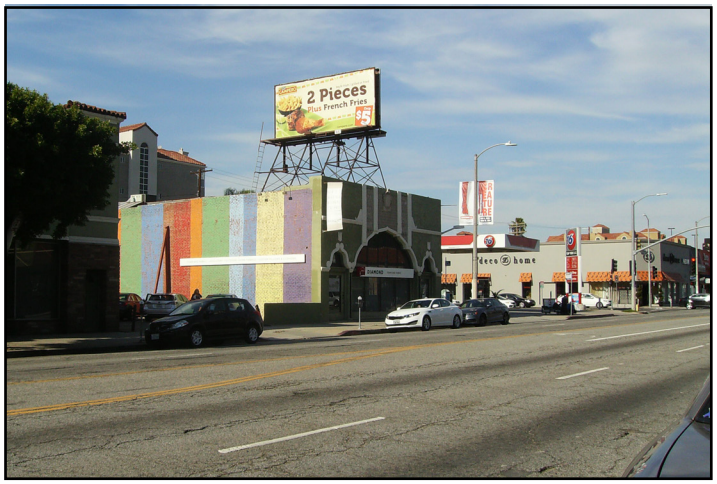
Figure 4
Photographs of the Project Site
Views 1-5

View 6: From the west side of S. Detroit Street, looking northeast at the properties to the west of the Project Site.

View 7: From the east side of La Brea Avenue, looking southwest at the construction of a Metro Purple Line station.

View 8: From the west side of La Brea Avenue, looking southeast at the properties to the east of the Project Site.

View 9: From the northwest corner of the intersection of La Brea Avenue and Wilshire Boulevard, looking northeast at properties to the east of the Project Site.



View 10: From the east side of La Brea Avenue, looking north west at properties to the north of the Project Site.

Source: Parker Environmental Consultants, 2017

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Figure 5
Photographs of the Surrounding Land Uses
Views 6-10

Abutting the Project Site to the south is the Wilshire/La Brea Purple Line Metro Station that is currently under construction. The rear of the Property adjoins a public alley that intersects West 6th Street to the north and curves east onto La Brea Avenue south of the Property. Land uses to the west, across the alley include 3, 4 and 5-story residential buildings. The land uses to the north include surface parking, a retail business and a gas station. Land uses to the east, across South La Brea include commercial retail uses, a building occupied by telecommunications equipment, and surface parking.

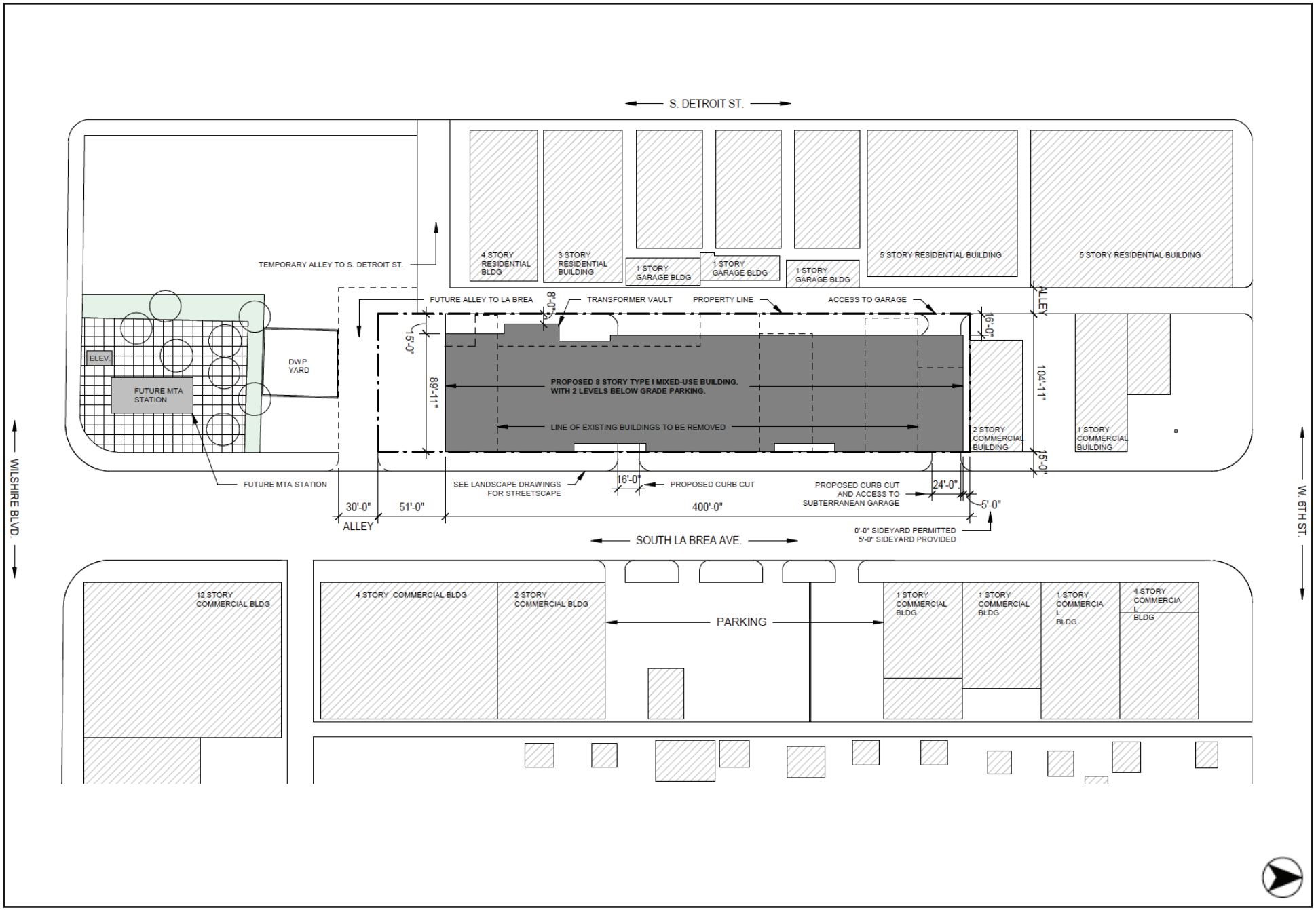
1.3 Proposed Project Description

The Proposed Project would include the demolition of the existing buildings and surface parking on the Project Site and the construction and operation of an 8-story mixed-use building with a height of approximately 101 feet and 10 inches in height at the top of the roof parapet (122 feet to the top of the rooftop mechanical equipment and structures), with 121 residential dwelling units, approximately 125 hotel rooms, and approximately 13,037 square feet of restaurant space ("Proposed Project"). Of the 121 dwelling units, 14 units would be restricted for Extremely Low Income households, which is equivalent to 11% of the total residential units. The Proposed Project would provide 192 vehicle parking spaces in two subterranean levels with a 40% reduction in code-required parking for the commercial uses pursuant to the TOC Guidelines. The Project would also provide 139 bicycle parking spaces (including 108 long-term spaces and 31 short-term spaces) pursuant to the Bicycle Ordinance. The Proposed Project would provide approximately 10,256 square feet of open space and amenity areas with a 25% reduction in required open space pursuant to LAMC Section 12.22.A.25(g)(2). The Proposed Project would include 201,123 square feet of total floor area resulting in a floor area ratio (FAR) of 4.25:1.[1] A summary of the Proposed Project is provided in Table 2, Proposed Development Program, below. The plan layout of the Proposed Project is depicted in Figure 6, Plot Plan. The floor plans are illustrated in Figure 7 through Figure 10.

Table 2
Proposed Development Program

Land Uses	Proposed Units	Proposed Floor Area (Square Feet)
Multi-Family Residential		
1-Bedroom	70	***130,138 sf***
2-Bedroom	45	
3-Bedroom	6	
Subtotal Multi-family Residential:	***121 du***	
Commercial		
Hotel	125 guest rooms	57,948 sf
Restaurant	--	13,037 sf
Subtotal Commercial:	***--***	***70,985***
TOTAL FLOOR AREA		**201,123 sf**
[a] *Includes amenity space and common circulation areas.*		

[1] *Lot 49 is currently being occupied and used by Metro as construction lay down space in conjunction with the Metro Purple Line Station, which such use is expected to continue until at least 2023. The proposed tract map will consolidate lots 38 through 48 and a portion of lot 49 into Lot 1 (proposed Project Site) and the remaining portion of lot 49 (comprising approximately 4,616 square feet) will become Lot 2. The proposed floor area and number of dwelling units and guest rooms is based on the lot area of Lot 1 only, which is 47,232 square feet in size (and 51,866 square feet in size including half the alley). The applicant has not developed any plans for future development of Lot 2. Any potential future programming on Lot 2 following completion of the Metro Purple Line Station, is not a part of the Proposed Project and is not envisioned at this time. Review of such uncertain future development would be speculative.*



Source: Togawa Smith Martin, September 24, 2019.

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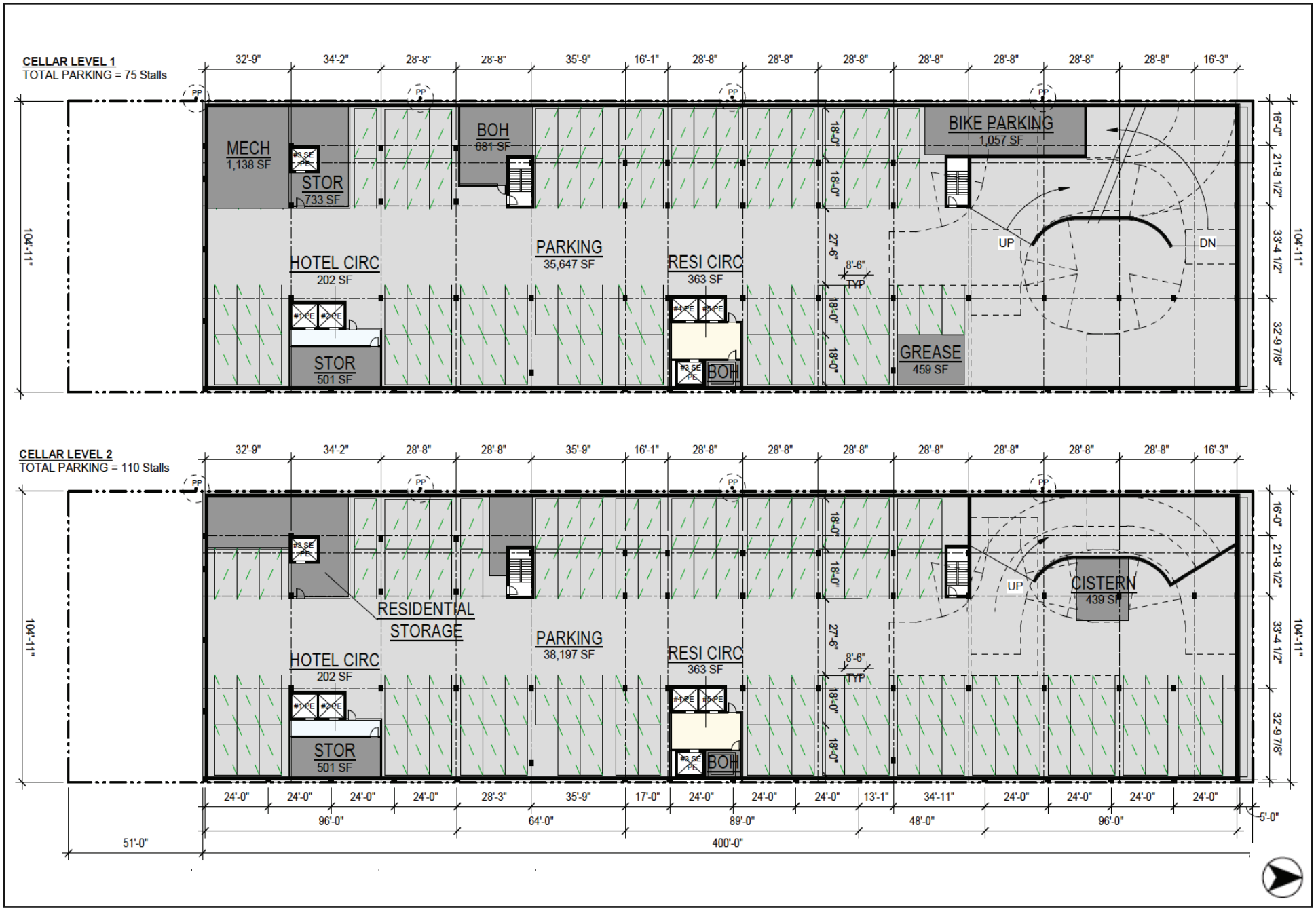
Figure 6
Plot Plan



Source: Togawa Smith Martin, September 24, 2019.

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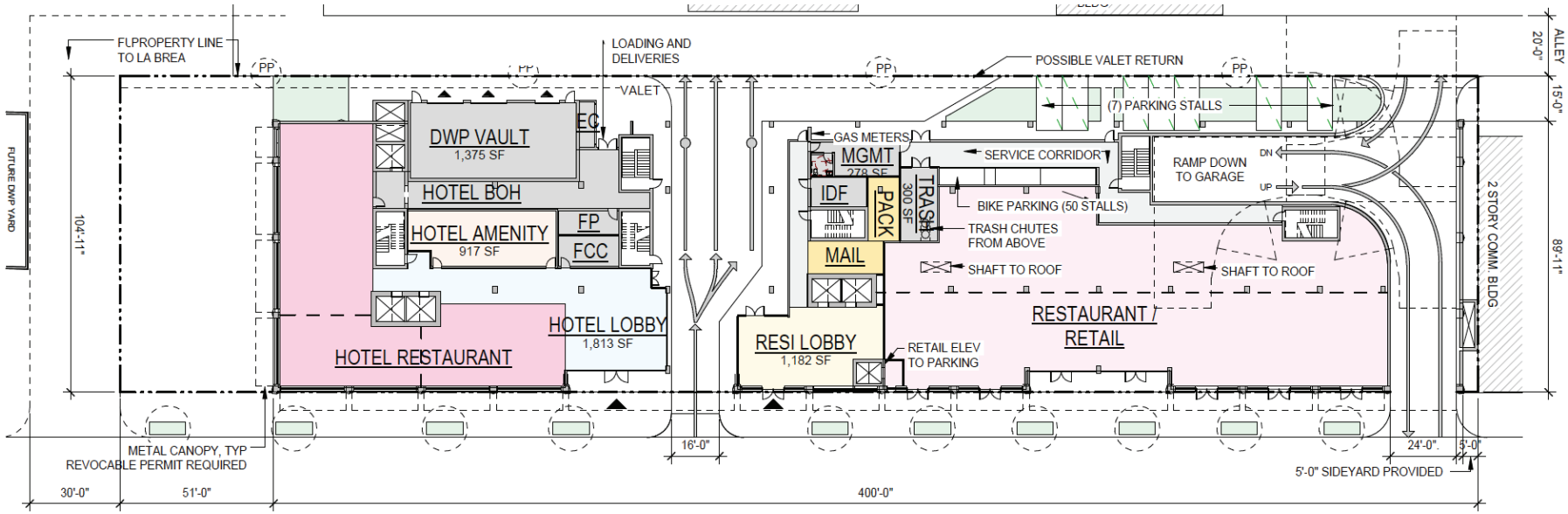
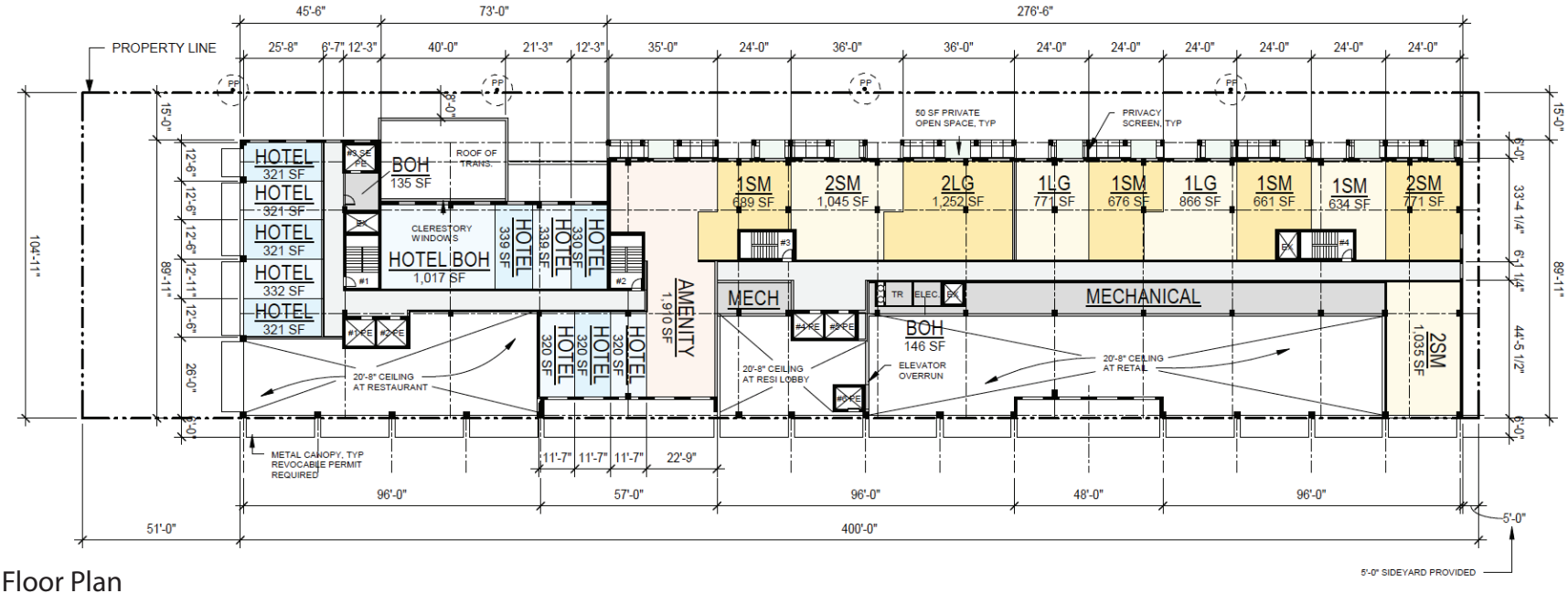
Figure 7
Cellar Levels 1 and 2 Floor Plans



Level 1 Floor Plan



Level 2 Floor Plan

Source: Togawa Smith Martin, September 24, 2019.

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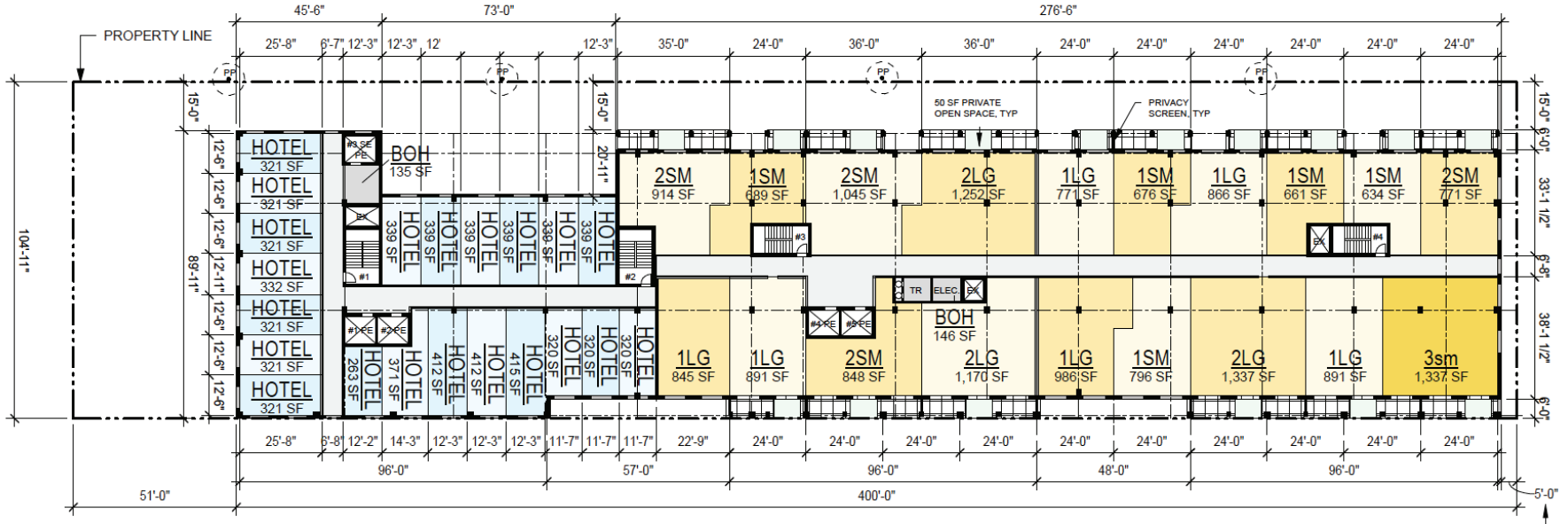
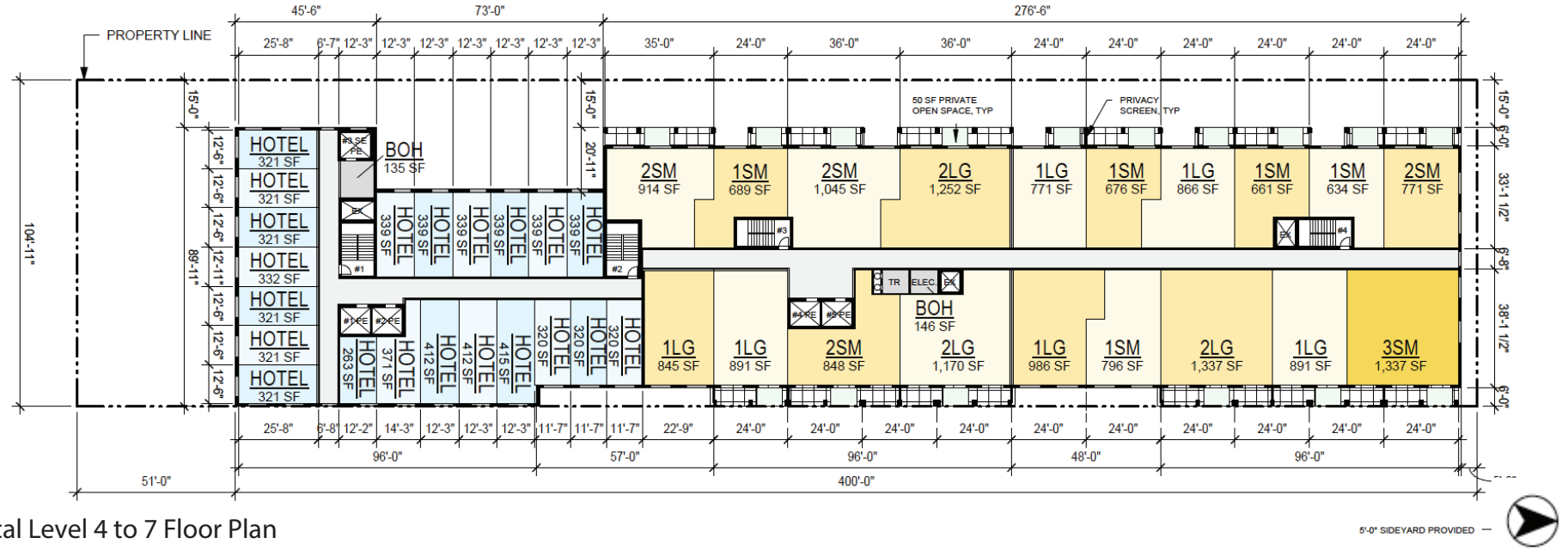
Figure 8
Level 1 and Level 2 Floor Plans



Level 3 Floor Plan



Typical Level 4 to 7 Floor Plan

Source: Togawa Smith Martin, September 24, 2019.

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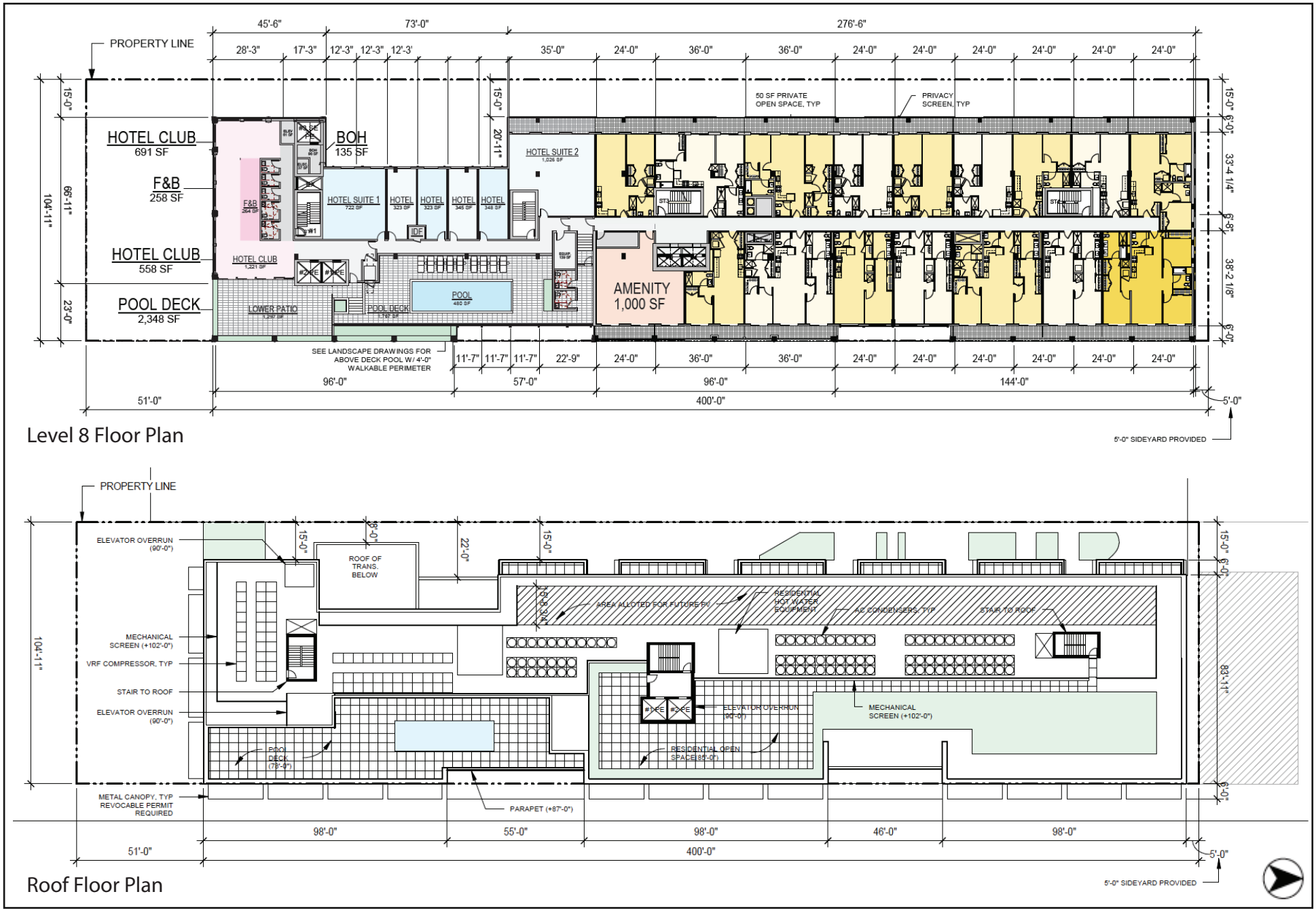
Figure 9
Level 3 to Level 7 Floor Plans



Source: Togawa Smith Martin, September 24, 2019.

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Figure 10
Level 8 and Roof Floor Plans

Vesting Tentative Tract Map

The proposed Vesting Tentative Tract Map No. 82618 occupies approximately 51,939 square feet of lot area, and includes lots 38 through 49 of Tract No.5273 Map Book 55-52 in the City of Los Angeles, County of Los Angeles, CA. The proposed tract map will consolidate lots 38 through 48 and a portion of lot 49 into Lot 1 (proposed Project Site) and the remaining portion of lot 49 will become Lot 2. The proposed floor area and number of dwelling units and guest rooms is based on the lot area of Lot 1 only, which is 47,232 square feet in size (and 51,866 square feet in size including half the alley). Lot 2 is comprised of 4,616 square feet and is not used for the purposes of density and floor area.

Residential Uses

As shown in Table 2, above, the Proposed Project would include a maximum of 121 dwelling units with approximately 130,138 square feet of residential floor area (including circulation and amenity areas). The unit mix includes 70 one-bedroom units, 45 two-bedroom units, and 6 three-bedroom units. Of the 121 proposed residential units, 11 percent of the units (14 units) would be reserved at the “extremely low income” level. The dwelling units would be located on levels two through five. No residential units would be located on the ground level. Since the Proposed Project would provide a minimum number of on-site restricted affordable housing units, it is considered an “Eligible Housing Development” which would allow the Proposed Project base incentives and additional incentives per the TOC Guidelines.

Commercial Uses

The Proposed Project would include 125 guest rooms with approximately 57,948 square feet of hotel floor area. The Proposed Project would include a total of approximately 13,037 square feet of restaurant space that would front La Brea Avenue.

Floor Area

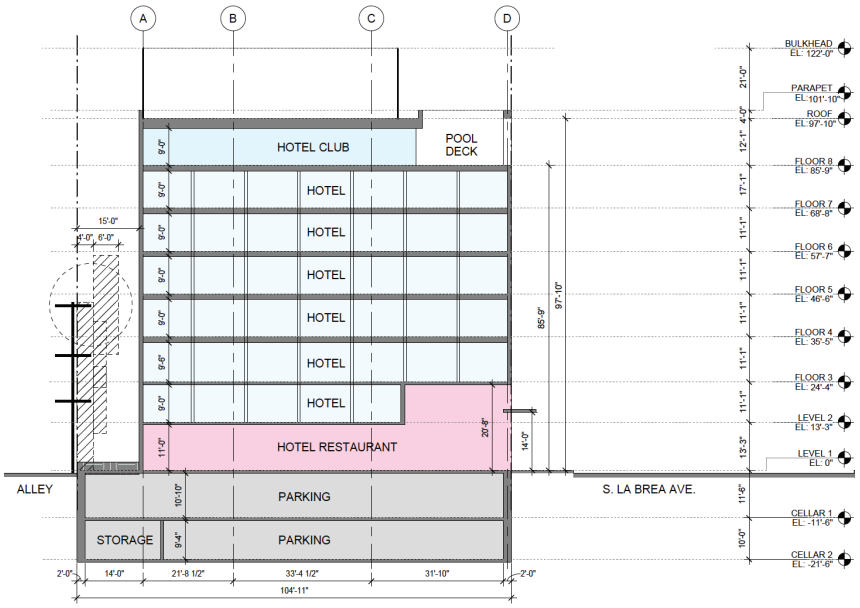
The Project Site includes a gross lot area of 47,323 square feet. Development on the Project Site is limited to a floor area ratio of 1.5:1 based on existing zoning. Per the TOC Guidelines, the Proposed Project is allowed an additional increase in residential FAR to 4.25:1 for a Tier 4 project located in a commercial zone. The Proposed Project would include 130,139 square feet of residential space and 70,985 square feet of commercial space. As such, the Proposed Project includes a total of approximately 201,123 square feet of floor area, resulting in a FAR of 4.25:1.

Density

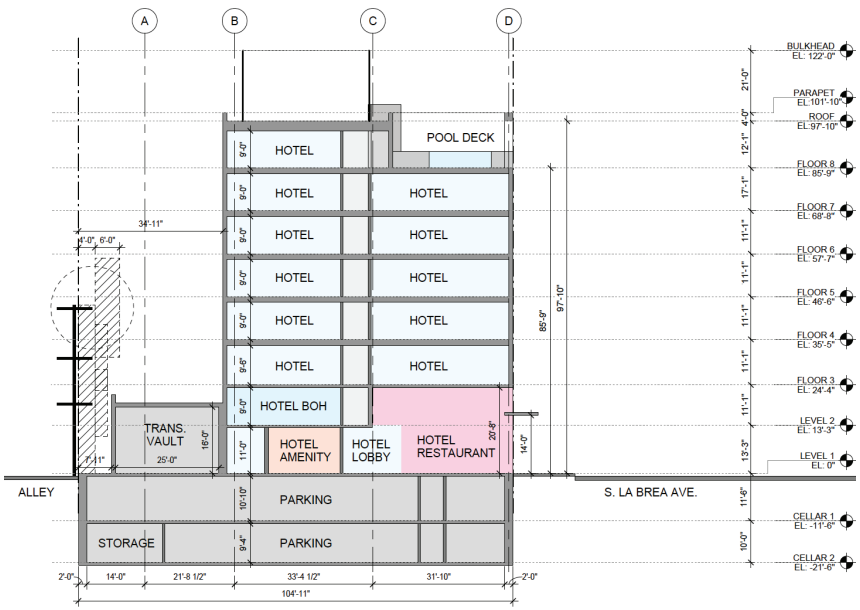
Under its zoning designation, residential uses proposed on a C2 zone shall be in compliance with the density regulations of the R4 Zone. As such, the minimum lot area per dwelling unit is 400 square feet and the minimum lot area per guest room is 200 square feet. Pursuant to LAMC Section 12.22.C.16, the area of one-half of the alley may be included for purposes of calculating density. With the addition of the area of one-half of the alley, the total area for the density calculation is 51,866 square feet. Therefore, a base density of 130 dwelling units and 259 hotel guest rooms are allowed for the Project Site. The Proposed Project proposes a total of 121 dwelling units and 125 guest rooms.

Height

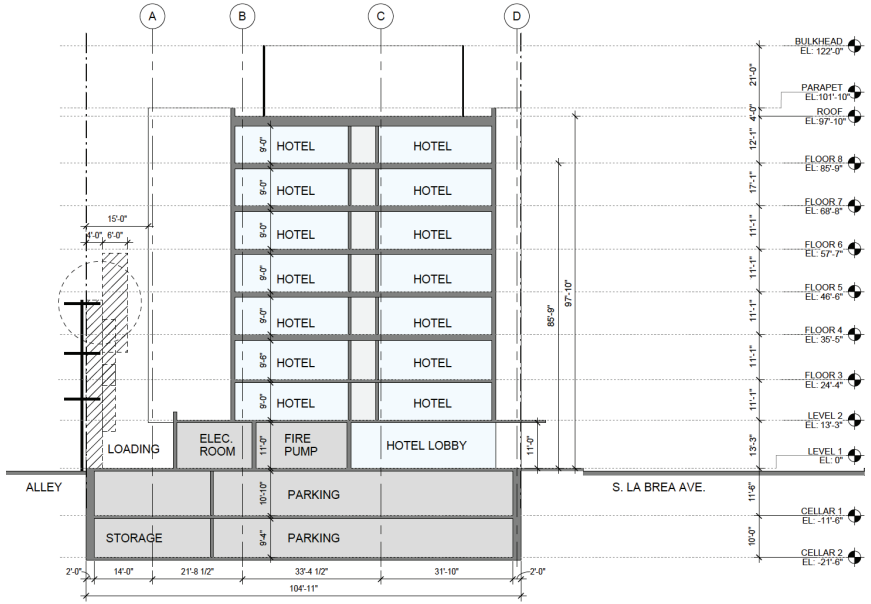
As stated previously, the Project Site is located in Height District 1, which has no height limitation but limits development by FAR, which is described above. The proposed eight-story building is planned for a roof height of 101 feet and 10 inches above grade, and a maximum height of 122 feet to the top of the rooftop mechanical equipment and structures. The Proposed Project’s building sections and elevations are provided in Figure 11 through 14.



Hotel and Hotel Restaurant Section



Hotel Restaurant Section



Hotel Lobby Section

Source: Togawa Smith Martin, September 24, 2019.

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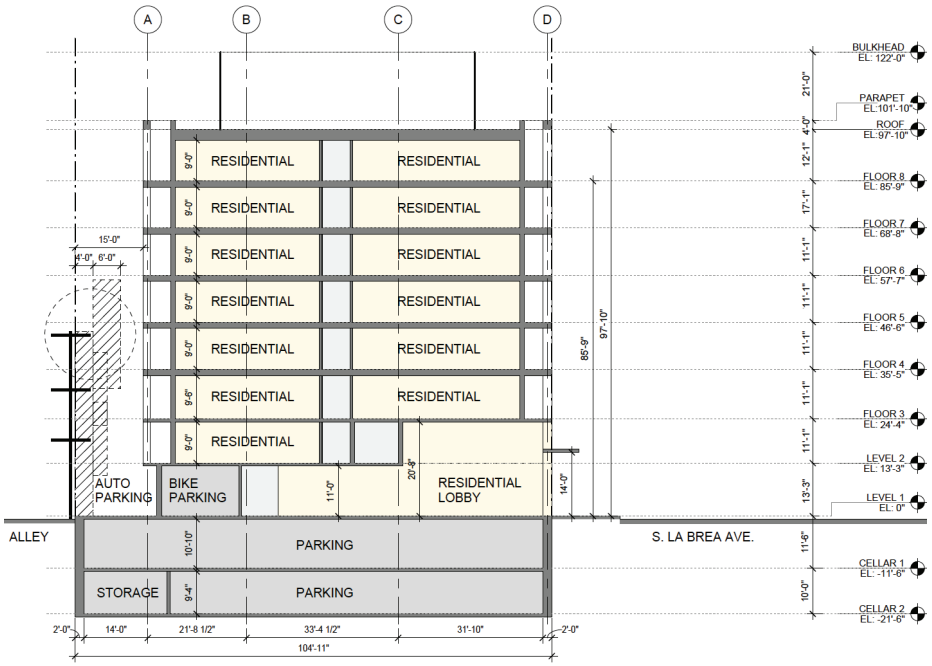
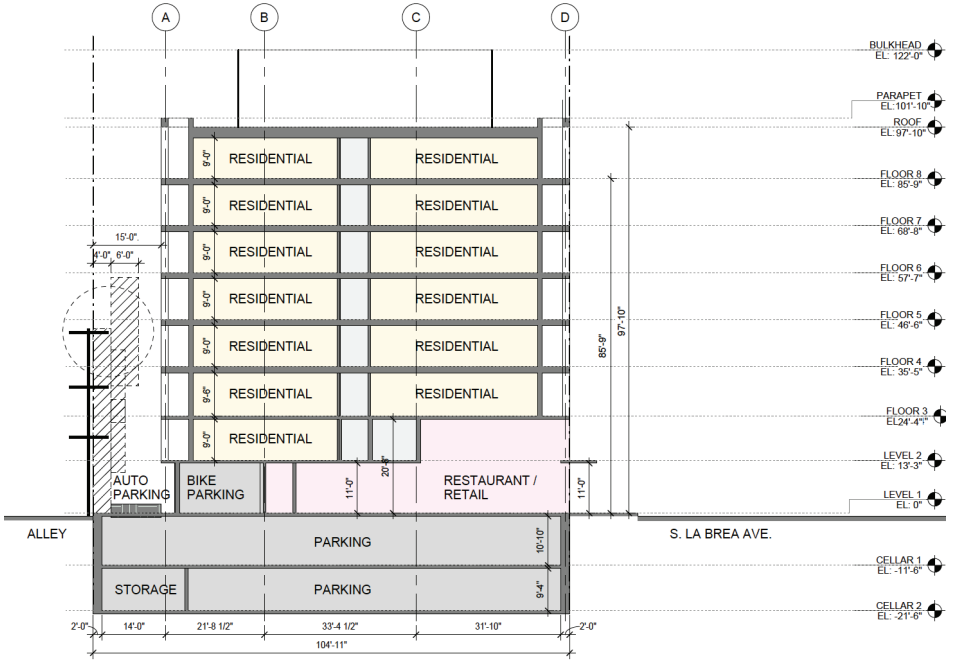
Figure 11
Building Sections - Hotel and Restaurants



Residential Lobby Section



Retail and Residential Section

Source: Togawa Smith Martin, September 24, 2019.

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Figure 12
Building Sections - Residential and Commercial

East Elevation (S. La Brea Ave.)

West Elevation (Alley)

Source: Togawa Smith Martin, September 24, 2019.

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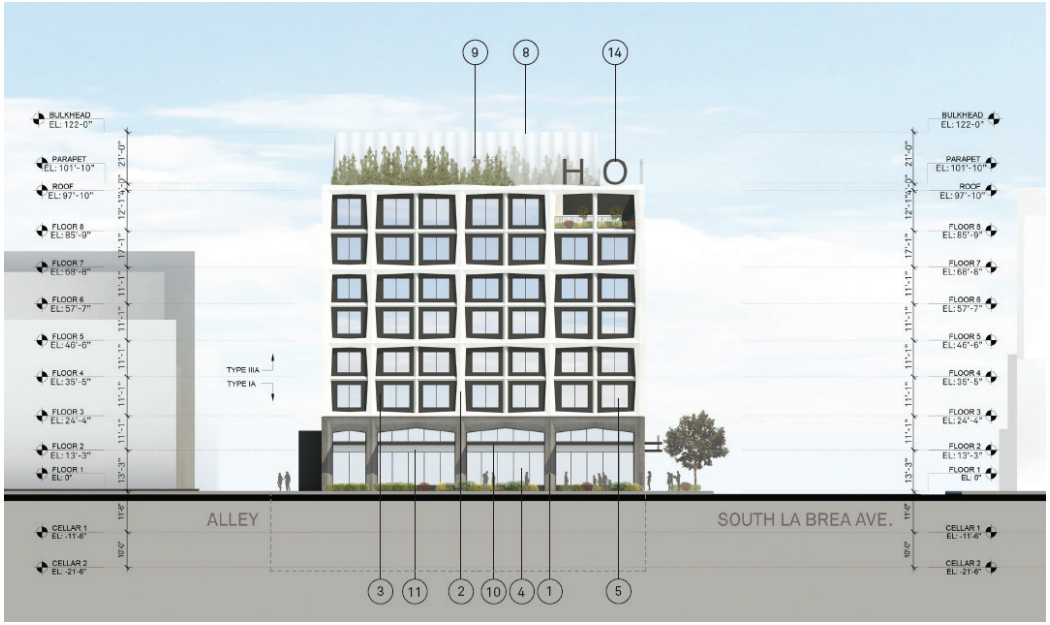
Figure 13
East and West Elevations



South Elevation
(From Wilshire Blvd.)

North Elevation
(From W. 6th St.)

Source: Togawa Smith Martin, September 24, 2019.

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Figure 14
North and South Elevations

Setbacks

Pursuant to LAMC Section 12.14.C, no front, side, or rear yard setbacks are required in the C2 Zone for commercial developments. For residential uses in the C2 zone, side yards and rear yards conforming to the requirements of the R4 Zone shall be provided and maintained at the floor level of the first story used in whole or in part for residential purposes. Pursuant to the TOC Guidelines, eligible housing developments located in any commercial zone may utilize any or all of the yard requirements for the RAS3 zone per LAMC Section 12.10.5. As such, five-foot side yard setbacks and a 15-foot rear yard setback are proposed for the Proposed Project, consistent with the RAS3 zone requirements pursuant to the LAMC and TOC Guidelines.

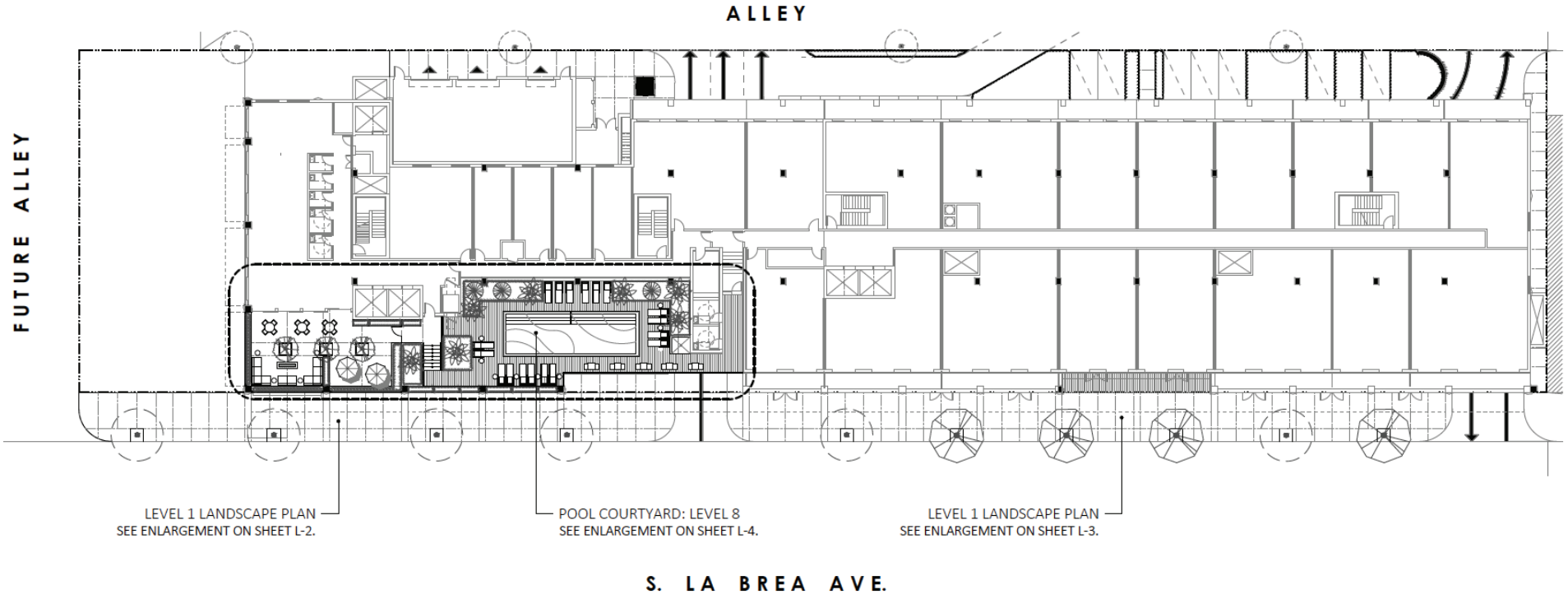
Open Space

The open space requirements and amount of open space proposed for the Proposed Project are summarized in Table 3, Summary of Required and Proposed Open Space Areas, below. The Proposed Project would be required to provide 13,675 square feet of open space. Per the TOC Guidelines, the Proposed Project would be allowed a 25 percent reduction in required open space for a Tier 4 development. As such, the Proposed Project would be required to provide 10,256 square feet of open space. The Proposed Project would provide approximately 10,256 square feet of open space in the form of common space, recreation rooms, and private open space. The Proposed Project would be required to provide a minimum of one tree per every four units for a total of 31 required trees on-site. The Proposed Project would provide a minimum of 31 trees on-site. The Proposed Project's composite landscape plan is provided as Figure 15.

Table 3
Summary of Required and Proposed Open Space Areas

LAMC Open Space Requirements	Dwelling Units	Required Open Space (square feet)
Less than 3 Habitable Rooms (100 sf/du) [a]	70	7,000
Equal to 3 Habitable Rooms (125 sf/du) [b]	45	5,625
More than 3 Habitable Rooms (175 sf/du) [c]	6	1,050
Subtotal:	***121***	***13,675***
Reduction allowed per TOC Guidelines (25%): [d]		*- 3,419*
TOTAL:		**10,256**
Proposed Open Space Area	**Proposed Open Space (square feet)**	
Common Space	2,564	
Recreation Rooms	2,542	
Private Balconies	5,150	
TOTAL:	**10,256 sf**	

Notes: du = dwelling unit; sf = square feet
[a] *Includes one-bedroom units.*
[b] *Includes two-bedroom units.*
[c] *Includes three-bedroom units.*
[d] *As an additional incentive pursuant to the TOC Guidelines for Tier 4, the Proposed Project would be requesting a 25% decrease in required open space.*
Source: Togawa Smith Martin Architects, September 24, 2019.



Source: Togawa Smith Martin, September 24, 2019.

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Figure 15
Composite Landscape Plan

Parking

Pursuant to the TOC Guidelines, the Proposed Project would be allowed to utilize the residential parking requirement of providing no parking spaces for an Eligible Housing Development in a Tier 4 area. As such, the Proposed Project would require no vehicle parking spaces for the residential dwelling units. The parking ratio for the Proposed Project's hotel use is based on LAMC Section 12.21.A.4(b), which requires one (1) parking space for each guest room or suite for the first 20 guest rooms, one (1) additional parking space for every two guest rooms or suites of rooms in excess of 20 but not exceeding 40 guest rooms, and one (1) additional parking space for every three guest rooms or suites of rooms in excess of 40 guest rooms.

Additionally, pursuant to LAMC Section 12.21.A.4.(c), there shall be at least one automobile parking space for each 100 square feet of restaurant space. Pursuant to the TOC Guidelines, the Proposed Project would be allowed to utilize the non-residential parking reduction of 40 percent, which requires 82 parking spaces for the restaurant space. Therefore, the Proposed Project would be required to provide a total of 149 vehicle parking spaces for the residential, hotel, and restaurant uses. The Proposed Project would provide a total of 192 parking spaces (43 residential spaces, 67 hotel spaces, and 82 restaurant spaces) within the parking garage. Therefore, as summarized in Table 4, the Proposed Project would be consistent with the applicable parking requirements.

Table 4
Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity	Parking Required		Parking Provided
		Rate	Spaces	
Residential				
TOC Tier 4 Project	121 du	0 [a]	0	
		Subtotal Residential	***0***	***43***
Hotel [b]				
1 – 30 Guest Rooms	30 guest rooms	1 per guest room	30	
31 – 60 Guest Rooms	30 guest rooms	1 per 2 guest rooms	15	
> 60 Guest Rooms	66 guest rooms	1 per 3 guest rooms	22	
		Subtotal Hotel	***67***	***67***
Commercial				
Restaurant	13,037 sf	1 per 100 sf [d]	**136**	
		TOC Tier 4 Reduction (40%)	*- 54*	
		Subtotal Commercial	***82***	***82***
		TOTAL	**149**	**192**

Notes:
du = dwelling unit, sf = square feet
[a] *For Residential Use: no parking spaces required for a Tier 4 Eligible Housing Development.*
[b] *For Hotel Use: LAMC Section 12.21.A.4(b).*
[c] *The Applicant is requesting an additional 20% reduction in required hotel parking spaces.*
[d] *For Commercial Use: Developments within the State Enterprise Zoning District required to provide 2 parking space for every 1,000 sf of commercial uses. (LAMC Section 12.21A4(x)(3).*
Source: Togawa Smith Martin Architects, September 24, 2019.

The Proposed Project provides on-site bicycle parking for short-term and long-term bike storage. As summarized in Table 5, below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC for bicycle parking spaces in providing 139 total short- and long-term spaces on-site. In the event the number of dwelling units is reduced from the current plans, the amount of vehicle and bicycle parking would be revised accordingly to meet the code requirements.

Table 5
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Parking Required [a]		Total Spaces Required	Total Spaces Provided
		Short Term	Long Term		
Residential [b,c]					
Units 1-25	25	3	25	28	
Units 26-100	75	5	50	55	
Units 101-200	21	1	11	12	
Subtotal Residential:				95	95
Hotel [d]					
Guest Rooms	125 rooms	13	13	26	26
Commercial [e]					
Commercial	13,037 sf	9	9	18	18
	TOTAL:	**31**	**108**	**139**	**139**

Notes:
du = dwelling unit, sf = square feet
[a] *LAMC 12.21 A.16. Bicycle Parking and Shower Facilities, revised May 9, 2018.*
[b] *Short-term bicycle rates for residential uses are as follows: 1 space per 10 units for first 25 units; 1 space per 15 units for units 26-100; and 1 space per 20 units for units 101-200.*
[c] *Long-term bicycle rates for residential units are as follows: 1 space per unit for first 25 units; 1 space per 1.5 units for units 26-100; and 1 space per 2 units for units 101-200.*
[d] *All hotels shall provide both short- and long-term bicycle parking at a rate of one space per 10 guest rooms.*
[e] *Commercial uses including retail shall provide both short- and long-term parking at a rate of one space per 2,000 sf.*
Source: Togawa Smith Martin Architects, September 24, 2019.

Design and Architecture

Figure 16 illustrates the Proposed Project's architectural renderings. The Proposed Project would be constructed to incorporate environmentally sustainable building features and construction protocols that meet and exceed the requirements of the Los Angeles Green Building Code. The Proposed Project would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving and low-flow fixtures, non-VOC paints and adhesives, drought tolerant planting, and high performance building envelopment. The building would also be designed to accommodate solar photovoltaic panels and on-site electric vehicle chargers. Additionally, other sustainability elements integrated within the Project may include:

- Use of natural ventilation and daylighting throughout the Project to reduce the load and size of electrical and mechanical systems;
- Use of drought resistant planting and grasses to reduce irrigation water use by more than 50%;
- Transportation Demand Management program;
- Re-use of existing commercial land;
- On-site amenities to reduce off-site transportation demand during the day, such as food service, retail shops, and a gym;
- Energy-efficient site lighting and design to meet the Illuminating Engineering Society of North America (IESNA) lighting density and control standards for minimizing light pollution;
- Floor plate layout and modeling of glazing systems that are conducive to daylighting strategies;
- Building systems designed to avoid the use of heating, refrigeration, and fire suppression systems that include chlorofluorocarbons or halon compounds;
- Energy efficient building envelope design, including high performance glazing, cool roof and green roof, and optimized insulation levels;
- Energy efficient lighting and HVAC equipment;

- Extensive building commissioning practices to fine-tune energy using system performance;
- Building energy management controls system to optimize energy performance
- Provision for on-site electric vehicle charging; and
- Indoor environmental quality measures, including selection of low-emitting interior finish materials, paints, and coatings; construction indoor air quality plan, during construction and prior to occupancy.

1.4 Discretionary Requests

The City of Los Angeles has the principal responsibility for approving the Proposed Project. Approvals required for development of the Proposed Project may include, but not limited to, the following:

- Vesting Tentative Tract Map, VTT-82618, pursuant to LAMC Section 17.03 to permit the subdivision of the Subject Property.
- A Transit Oriented Communities (TOC) project pursuant to LAMC Section 12.22.A.31 to permit a Housing Development Project dedicating 11% of total density for units restricted to Extremely Low Income Households in exchange for base incentives permitted by the TOC program and the additional incentives below:
    - An Additional TOC Incentive pursuant to LAMC Section 12.22.A.25(g)(2) to permit RAS3 setbacks in lieu of the setbacks otherwise required in the C2 zone;
    - An Additional TOC Incentive pursuant to LAMC Section 12.22.A.25(g)(2) to permit a 25% reduction in required open space.
- Master Conditional Use Permit pursuant to LAMC Section 12.24 W.1 to permit the sale and dispensing of alcohol on-site; and
- A Conditional Use Permit pursuant to LAMC Section 12.24.W.24 to permit a hotel within 500-feet of a residentially zoned property; and
- Site Plan Review pursuant to LAMC Section 16.05 to permit the construction, use, and maintenance of a project with more than 50 dwelling units.

Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project, including certificates, permits to remove on-site and off-site trees, demolition permits, haul route approval, grading and associated building permits.

Perspective Elevation

View North on
S. La Brea Avenue

Source: Togawa Smith Martin, September 24, 2019.

PARKER
ENVIRONMENTAL CONSULTANTS

Figure 16
Architectural Renderings

2.0 Sustainable Communities Strategy Criteria

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

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

Consistent. The Property is zoned C2-1 and designated for General Commercial land uses by the Wilshire Community Plan, which include restaurant, hotel, and multi-family residential. The Proposed Project is subject to the design regulations of the LAMC and allowed Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines) incentives, where applicable. Pursuant to Section 12.17.1 of the LAMC, the zoning permits density equivalent to the R4 Zone at a ratio equivalent to one dwelling unit per 400 square feet of land area, allowing up to 130 dwelling units. Additionally, guest rooms are allowed at a ratio equivalent to one guest room per 200 square feet of land area, allowing up to 259 guest rooms. The Proposed Project would include 121 dwelling units and 125 hotel guest rooms. Yards shall be provided in accordance with the RAS3 Zone, pursuant to the TOC Guidelines. The Project Site is designated as Height District 1 in the C2 Zone, which permits unlimited height and a base Floor Area Ratio (FAR) of 1.5:1. The Project Site is located within Tier 4 of the City's TOC program, which permits a residential FAR of 4.25:1 in Commercial Zones. The Proposed Project would be consistent with the required open space, vehicle parking, and bicycle parking requirements of the LAMC with applicable TOC Guidelines reductions. The Proposed Project complies with all applicable provisions of LAMC Section 12.22.A.31 and the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (added by Ordinance No. 184,745).

The Project is consistent with the general land use designation, density, and building intensity in the Southern California Association of Government's (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use types into 35 "place types," and then classified sub-regions into one of three land use development categories: Urban, Compact, or Standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (SCAG, 2016 RTP/SCS, p. 20-21.)

SCAG's 2016-2040 RTP/SCS growth strategy defines various urban footprint place types (SCAG, 2016-2040 RTP/SCS Appendix: SCS Background Documentation (at page 90), "Place Types Categorized into Land Development Categories (LDCs)"; SCAG 2016-2040 RTP/SCS Appendix: SCS Background Documentation (at page 90), "Urban Footprint—Place Types Summary," (at pages 1-2). The Project is consistent with the Town Mixed-Use place types within the "Compact" Land Development Category. Each category is briefly described and a Project summary illustrating general consistency with these categories is provided below.

- Town Mixed-Use areas are walkable mixed-use neighborhoods, such as the mixed-use core of a small city or transit oriented development, with a variety of uses and building types. Typical buildings are between 3 and 8 stories tall, with ground-floor retail space, and offices and/or residences on the floors above. Parking is usually structured, above or below ground. The typical land use mix for this place type is approximately 26 percent residential, 20 percent employment, 29 percent mixed use, and

25 percent open space/civic. The residential mix is 100 percent multi-family. The average total net Floor Area Ratio (FAR) is 1.9:1 and the gross density ranges from 7 to 35 households per acre (SCAG, 2016-2040 RTP/SCS Appendix: SCS Background Documentation, p. 90, "Urban Footprint—Place Types Summary."

Based on Exhibit 5 and Exhibit 6 of SCAG's SCS Background Documentation, the Project Site and surrounding area are within the "Compact" Land Development Category (SCAG, 2016-2040 RTP/SCS Appendix: SCS Background Documentation, p. 10-11). The 2016-2040 RTP/SCS provides the following definition for the "Compact" Land Development Category:

> ***Compact.*** *These areas are less dense than those in the Urban Land Development Category, but they are highly walkable with a rich mix of retail, commercial, residential and civic uses. These areas are most likely to occur as new growth on the urban edge, or as large-scale redevelopment. They have a rich mix of housing, from multifamily and attached single-family (townhome) to small- and medium lot single-family homes. These areas are well served by regional and local transit service, but they may not benefit from as much service as urban growth areas and are less likely to occur around major multimodal hubs. Streets in these areas are well connected and walkable, and destinations such as schools, shopping and entertainment areas can typically be reached by walking, biking, taking transit, or with a short auto trip. (SCAG, 2016-2040 RTP/SCS, at page 20.)*

As described above, the Proposed Project would include the development of a Tier 4 TOC Project with 121 residential dwelling units, 125 hotel rooms, and approximately 13,037 square feet of restaurant space. The Proposed Project would include 201,123 square feet of total floor area resulting in a floor area ratio (FAR) of 4.25:1. The Proposed Project's average residential density is 112 units per acre. Thus, the Project is consistent with the SCAG "Urban" Land Use Designation, as well as the associated density and building intensity assumptions in SCAG's 2016-2040 RTP/SCS. Furthermore, the Proposed Project is consistent with the applicable goals and policies in the 2016 RTP/SCS, as outlined in Attachment B. As such, the Project is consistent with this criterion.

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

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

Consistent. The Proposed Project includes the development of a mixed-use development with residential, hotel and commercial restaurant land uses. The Proposed Project would include a total of 201,123 square feet of floor area resulting in a floor area ratio (FAR) of 4.25:1. The breakdown of area by land use is as follows:

Residential Floor Area: 130,138 sf (65 %)
Hotel Floor Area: 57,344 sf (28 %)
Restaurant Floor Area: 13,037 sf (6 %)

Based on the above calculations, nonresidential floor area accounts for approximately 34% of the total floor area, however the Proposed Project has an FAR in excess of 0.75, therefore the Proposed Project meets the criteria in PRC Section 21155(b).

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

Consistent. The Proposed Project would include 121 residential dwelling units on a 47,323 square foot (1.08 acre) Project Site. The Proposed Project's average residential density is 112 units per acre. Therefore, the Proposed project would be consistent with this criterion.

(3) Be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. A major transit stop is as defined in Section 21064.3, except that, for purposes of this section, it also includes major transit stops that are included in the applicable regional transportation plan. For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service with service intervals no longer than 15 minutes during peak commute hours. A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area further than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor.

Consistent. The Project Site is designated as a Transit Priority Area and is within ¼-mile (walking distance) of major transit stops at the intersection of La Brea Avenue/6th Street (approximately 150 feet south of the Project Site) and Wilshire Boulevard/La Brea Avenue (approximately 220 feet north of the Project Site). La Brea Avenue, Wilshire Boulevard, and 6th Street are served by several bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) with headways of 15 minutes or less during commute peak hours, including Metro lines: 20, 212, and 720. Additionally, a Metro Purple Line railway station is currently under construction, immediately adjacent to the south of the Project Site, at the intersection of Wilshire Boulevard and La Brea Avenue. Therefore, the Proposed Project is located within ¼-mile of a high-quality transit corridor and the future Wilshire Boulevard and La Brea Avenue Metro Purple Line station.

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

(1) The transit priority project and other projects approved prior to the approval of the transit priority project but not yet built can be adequately served by existing utilities, and the transit priority project applicant has paid, or has committed to pay, all applicable in-lieu or development fees.

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

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

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

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

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

(C) For the purposes of this paragraph:

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

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

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

Consistent. The Project Site is located in a heavily urbanized area of in the City of Los Angeles. The Project Site is entirely developed with commercial and medical office land uses with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Due to the highly urbanized surroundings,

there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Thus, the Proposed Project would not interfere with the movement of any residents or migratory fish or wildlife.

The Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Vegetation on the Project Site is limited to six trees (*Ficus sp.* and *Podocarpus sp.*) located in the public right-of-way fronting the Project Site along La Brea Avenue and one tree that is in the parkway adjacent to the Project Site (See Tree Report, Attachment B). None of these seven trees are protected native trees as defined by Article 6, Sec. 46.01 of the LAMC. Four mature trees will be removed and will be replaces at a 1:1 ratio with a suitable street tree. Removal of trees in the public right-of-way requires approval by the Board of Public Works. All replacement trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

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

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

Consistent. Pursuant to Government Code Section 65962.5, the Department of Toxic Substances Control (DTSC) shall compile and update as appropriate, at least annually, a list of all hazardous waste facilities subject to corrective action (pursuant to Section 25187.5 of the Health and Safety Code), all land designated as hazardous waste property or border zone property (pursuant to Section 25220 of the Health and Safety Code), all information received by the DTSC on hazardous waste disposals on public land (pursuant to Section 25242 of the Health and Safety Code), and all site listed pursuant to Section 25356 of the Health and Safety Code. Based on the DTSC EnviroStor database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination. Therefore, the Project Site is not located on a site that the DTSC and the Secretary of the Environmental Protection have identified as being affected by hazardous wastes or clean-up problems.

Additionally, a Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project Site, by Partner Engineering and Science, Inc., dated November 27, 2018 (Attachment C, Phase I Environmental Site Assessment). The purpose of the Phase I ESA was to identify existing or potential Recognized Environmental Condition (RECs) in connection with the Project Site. The Phase I ESA identified the Project Site as a Facility and Manifest Data (HAZNET) and Recovery Act - Large Quantity Generator (RCRA-LQG) site in the regulatory database records search in connection with operations at the Project Site. The property at 665 S. La Brea Avenue is listed as a HAZNET site. A waste inventory includes off-specification aged or surplus organics, and laboratory waste chemicals. The generated waste disposal method is reported as stored, bulked and/or transferred offsite. No additional information regarding this listing was available in the regulatory database report. Based on the nature of the operations and the lack of documented release or violation, this listing is not expected to represent

a significant environmental concern. The property at 647 S. La Brea Avenue is listed as a RCRA-LQG site. This listing appears to correspond to a manhole containing telephone equipment located adjacent to the Project Site and not a former on-site tenant within the Project Site at 637 S. La Brea Avenue. Based on the current regulatory status and lack of a reported release, this listing is not expected to represent a significant environmental concern to the Project Site. Therefore, based on the nature of operations, regulatory status, and the lack of a reported release or violation, these listings do not represent a significant environmental concern.

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

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

(B) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with state and federal requirements.

Consistent. A Phase I Environmental Site Assessment (Phase I ESA), prepared for the Project Site, identified the Project Site as a HAZNET and RCRA-LQG site in the regulatory database records search in connection with operations at the Project Site. Based on the nature of operations, regulatory status, and the lack of reported releases or violations, these listings on-site do not represent a significant environmental concern.

A records and database search of the surrounding properties found the property to the south of the Project Site, at 5323 Wilshire Boulevard, listed as an EDR Hist Auto site. The property located to the east of the Project Site, at 666 South La Brea Avenue, was identified as a UST, SWEEPS UST, CA FID UST, RCRA-SQG, FINDS, EMI, HAZNET, ECHO, and EDR Hist Auto site. The properties to the north of the Project Site, at 619 and 621 South La Brea Avenue were found as a RCRA-SQG, FINDS, ECHO, and US EDR Historical Cleaners site. The Phase I ESA found that no reported releases have occurred at any of the aforementioned properties. Based on the regulatory statuses, these surrounding sites are not expected to represent a significant environmental concern to the Project Site.

The Phase I ESA identified one site of concern: the property approximately 300 feet north of the Project Site at 5436 West 6th Street. This property reported a release of gasoline in 2007, which reportedly impacted groundwater. This facility since received regulatory closure as of July 5, 2016. Since the Proposed Project would include subterranean levels, it is likely that groundwater would be encountered during redevelopment activities. Based on the close proximity of the leaking underground storage tank (LUST) site to the north of the Project Site, the Phase I ESA recommends a dewatering and groundwater management plan to be implemented prior to the redevelopment of the Project Site. Compounds of concern were present in the groundwater beneath the Project Site at concentrations, which would prohibit direct discharge into the storm drain system, and treatment and confirmation sampling would likely be required for any effluent generated at the Project Site. The Proposed Project shall implement a dewatering and groundwater management plan and treat and confirm sampling of any effluent generated at the Project Site during construction.

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

Consistent. The Project Site consists of a medical office building, a print shop, and fabric store. Generally, properties eligible for listing in the National Register are at least 50 years old. The California Office of Historic Preservation generally recommends an evaluation of buildings and structures older than 45 years of age by professionals meeting the Secretary of the Interior Standards Professional Qualifications for Architectural History and Archeology. According to ZIMAS, the existing buildings located at 627, 631, 635, 639, 659 and 665 La Brea Avenue were built in 1924, 1928, 1929, 1931 and 1929, respectively. In January 2015, the City of Los Angeles Department of City Planning, Office of Historic Resources, completed the Historic Resources Survey Report for the Wilshire Community Plan Area, which included a broad survey of the Community Plan Area that included the Project Site. Neither the City of Los Angeles Zoning Information and Map Access System (ZIMAS), nor the Survey LA Findings for the Wilshire Community Plan Area identify the existing buildings on the Project Site as historic or potentially historic resources.

Based on a site-specific historic resources records search conducted by the South Coastal Information Center (SCCIC) (See Appendix C to this SPCE), it was confirmed that none of the existing buildings on the Project Site are identified as historic or potentially historic resources on any of the following resource databases: the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM). As such, the development of the Proposed Project would be not result in a substantial adverse change to a historical resource pursuant to Section 21084.1 of the CEQA Guidelines.

In furtherance of this assessment, the Applicant retained Historic Resources Group to prepare a historic impact assessment of the existing buildings on the Project Site and adjacent to the site to determine whether the Proposed Project would have the potential to result in impacts to historic resources. The HRG analysis concluded that the five commercial buildings and multiple surface parking lots on the Project Site were not identified as potential historical resources during that study, either individually or as part of a potential historic district. They are re-evaluated in this report based on an observation of existing conditions, primary and secondary source research related to the history of the properties, review of the relevant historic contexts, and an analysis under the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument. A site visit was conducted on November 19, 2018. Based on this analysis, HRG concluded that the commercial buildings and surface parking lots on the Project Site are not eligible for historic designation at the federal, state, or local levels. Therefore, there are no potential impacts to historical resources on the Project Site as defined by the California Environmental Quality Act (CEQA). The Historic Resources Assessment is included in Attachment E.

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

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

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

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

Consistent. The Project Site consists of a medical office building, a print shop, and fabric store. These types of land uses are not typical operations associated with high risk of fire or explosions. Additionally, the Project Site is surrounded by commercial, retail, residential, and office land uses. These uses are also not typical operations associated with high risk of fire or explosions, such as industrial or warehousing facilities. According to the DOGGR map, the Project Site is located within an immediate vicinity of an oil field. Due to the close proximity of significant oil production areas, the Project Site has been identified by the Los Angeles Department of Building and Safety (LADBS) as part of a "Methane Buffer Zone: Methane Buffer Zone sites include sites immediately surrounding gas sources where testing and mitigation are required by the LADBS. As such, prior to the issuance of a building permit, the Project Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level, which would prevent or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval. Therefore, with proper design and approval, the Project Site is not subject to 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 the standards established by any state or federal agency.

Consistent. As discussed above, the Phase I ESA found no reported releases of hazardous materials have occurred from the surrounding properties, with one exception. The Phase I ESA identified one site of concern: the property approximately 300 feet north of the Project Site at 5436 West 6th Street. This property reported a release of gasoline in 2007, which reportedly impacted groundwater. Therefore, the Proposed Project shall implement a dewatering and groundwater management plan and treat and confirm sampling of any effluent generated at the Project Site during construction.

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

Consistent. According to ZIMAS, there are no mapped active faults that cross through or project toward the Project Site, and the Project Site is not within an Alquist-Priolo Special Study Fault Zone area. The nearest fault is the Puente Hills Blind Thrust, located approximately 2.5 miles from the Project Site. The Project Site is located within the seismically active area of Southern California and there is a high potential for the Project Site to experience strong ground shaking from local and regional faults. These hazards and their potential impact can be relieved with proper seismic design. The intensity of ground shaking is highly dependent upon the distance of the fault to the Project Site, the magnitude of the earthquake, and the underlying soil conditions. As with any

new proposed development, the Proposed Project would be required to adhere to current engineering standards, the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code, the Los Angeles Municipal Code, and design recommendations set forth in the Geotechnical Report as well as the recommendations provided in the final design-level geotechnical report that will be required by the City's Department of Building and Safety prior to the issuance of the Proposed Project's grading and building permits to ensure that the proposed structure may withstand typical seismic ground shaking and seismically induced settlement.

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

Consistent. The Project Site is not within an area identified as susceptible to landslides according to the City of Los Angeles Safety Element (See Exhibit C of the Safety Element) and ZIMAS. Additionally, the Project Site is not located in the zone of required investigation for landsliding based on the seismic hazard zone map for the Hollywood 7.5-Minute Quadrangle (CGS, 2017). Furthermore, the Project Site is not in an area designated as a 100-year flood hazard area as mapped by the FEMA's Flood Insurance Rate Map. The Project Site is in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain and located within an area of minimal flooding. Therefore, the Proposed Project would have a low risk for landsliding and flooding.

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

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

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

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

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

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

Consistent. The Project Site is entirely developed with commercial and medical office land uses with impermeable surfaces and does not contain any developed open space with any public, recreational amenities. Therefore, the Project Site does not support any developed open space. Thus, the Proposed Project would not interfere with any existing open space.

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

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

1. Energy Efficiency

As part of this analysis, a Title 24 Energy Performance Report was prepared by Optimum Energy Design (OED) in April 2019 to demonstrate how the Proposed Project will meet the criteria of PRC section 21155.1 subsection (a) (8) requirement for energy and water efficiency and be 15 percent more energy efficient than required by Title 24, Part 6, the California Energy Code. Based on the Performance Method compliance path, OED conducted a preliminary whole building energy modeling assessment to determine the anticipated Title 24 energy code performance. The energy modeling was done using Energypro which is a software tool approved by the California Energy Commission to generate a comparison of the Proposed Design to a Baseline Design compliant to Title 24 (2016).

Key performance measures and features of the Proposed Design that increase the building energy efficiency include:

Building Envelope

- High-performance window system: The Project would use a thermally broken, double glazed window system with low-emissivity coatings and insulated spandrel panels for first floor. The Project would use a double glazed window system with low-emissivity coatings for rest of floor. These combined effects reduce cooling energy during the summer and heating during the winter.

- Efficient Exterior Walls: For level 2 thru Level 8, The Project would use a 6" Metal stud wall with R-19 batt insulation plus R-10 rigid insulation for exterior walls. This will also reduce cooling energy during the summer and heating during the winter.

HVAC System

- The building will be served by High efficiency VRF (variable refrigerant flow) systems ranging from 10.2 to 12.10 Energy Efficiency Rating (EER) & 19.5 to 23.0 Integrated Energy Efficiency Ratio (IEER).

- VRF technology brings an array of advantages over conventional systems. It saves energy by variable-speed compressors in outdoor units & provides extremely high part-load efficiency, which helps to reduce overall energy consumption during part load condition. Also, energy efficiency would increase during heat recovery mode.

- By eliminating the need for large distribution fans and water pumps, VRF technology provides energy saving for fan and pumping energy.

- Users can set individual temperature set points for multiple zones. Variable-speed compressors with wide capacity and precise modulation help maintain each zone's temperature within a narrow range.

Domestic Water Heating

- Centralized hot water system: Large centralized hot water systems use more efficient equipment than individual heating systems within the units. The Project would use a centralized hot water system that is 85% efficient. The water heating system has recirculation controls to keep water in the lines hot, reducing hot water wait time and water waste. This hot water system also makes it easier to integrate renewable energy systems like solar hot water.

- Solar Collectors: The Project would use a solar hot water factor of 0.1, in that 10% of the hot water heating system will be provided from the solar collectors. Energy usage is reduced in the centralized hot water system.

- High-efficiency water fixtures: By specifying fixture flow rates per the more stringent City of Los Angeles Green Building Code versus the standard CalGreen Code, the Project will inherently use less hot water. As a result, there is lower energy consumption.

Based on the values in the model, the Energy Use Intensity (EUI) of the Proposed Design has an estimated EUI of 146.68 Time Dependent Valuation (TDV), compared to the Baseline of 173.53 TDV of conditioned floor Area. With the incorporation of these performance measures, the Project exceeds Title 24 standards by 15.40%.

2. Water Efficiency

OED also prepared a Total Water Use Reduction Report, dated April 2019 (Attachment F.2), to demonstrate how the Proposed Project will meet the criteria of PRC section 21155.1 subsection (a) (8) requirement to use 25 percent less water than the average household in the region. The analysis focuses on estimating the average daily water usage of the Proposed Project. The water usage was estimated based on expected occupancy, water fixtures and daily usage profiles per 2016 California Plumbing Code and 2016 California Green Building Standards Code method.

Plumbing Fixtures and Proposed Design

The following are some of the water efficient strategies that are proposed for the Proposed Project:
- Low flow showerheads: 1.5 gallons per min
- Low flow lavatory faucets: 0.5 gallons per min
- Low flow kitchen faucets: 1.5 gallons per min
- Low flow toilets: 1.28 gallons per flush
- Low flow urinals: 0.125 gallons per flush
- Energy star certified dish washers
- Energy star certified clothes washers

Assuming annual days of operation of the building is 365 days, annual plumbing domestic water usage (exclude dishwasher and clothes washer) of residential units and hotel rooms and the retail space is calculated based on LEED V4 Water Use Reduction Calculator using full-time equivalency (FTE). Dishwasher in each unit is required to be Energy Star certified unit per 2016 California Plumbing Code. According to 2016 California Green Building Standard Code, a standard Energy Star dishwasher uses 4.25 gallons water per cycle. Clothes washer in each unit is required to be Energy Star certified unit per 2016 California Plumbing Code. According to 2017 Title 20 California Code of Regulation, Water Factor (WF) of a standard frontloaded residential clothes washer after January 1, 2018 is 4.7 gallons/cu./cycle. Capacity of the proposed clothes washer is 1.6 cubic feet. The irrigation demand was calculated based on the Maximum Applied Water Allowance (MAWA) from the City of Los Angeles interim Irrigation Guidelines as Compliance with State Landscape Ordinance Pursuant to AB 1881. The Proposed Project has plans to include a 420 sf (30’ x 14’) pool and a 504 sf (36’ x 14’) pool per architectural plan. Total pool surface area is 924 sf. Due to evaporation /splash, approximately 3/4 inches of water loss is assumed per square feet per day. Parking structure water usage was based on the City of Los Angeles Department of Public Works - Bureau of Sanitation Sewer Generation Rates (0.02 gallons per sf),

Water Reduction

According to the Metropolitan Water District Water Tomorrow Annual Report to the California State Legislature, Covering Fiscal Year 2017/18, the average regional gallons per capita per day usage is 130 gallons. Based on full-time equivalency (FTE) from LEED calculation method, in residential units/ hotel, occupants are using water closet 5 times a day/person; in retail space employees are using water closet /urinal 3 times a day/person, and visitors are using 0.5 time a day/person. Considering FTE values as weighed factors when calculating total equivalent occupancy, then total equivalent occupancy of the Proposed Project is 1608, resulting a baseline usage of 210,340 gallons per day.

Based on the estimated water usage of the proposed design, the Proposed Project is estimated to use approximately 56,686 gallons of water per day. With the incorporation of the water efficient design, the Proposed Project would result in a 73% reduction from the estimated baseline.

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

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

Consistent. The Project Site includes approximately 51,939 square feet of lot area, or 1.19 acres. As shown on the proposed Tract Map, Lot 1 is comprised of 47,323 square feet of lot area (1.09 acres) and Lot 2 is comprised of 4,616 square feet of lot area (0.11 acres) . As such, the Project Site is not more than eight acres in total area.

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

Consistent. The Proposed Project would include 121 residential dwelling units. Therefore, the Proposed Project would provide less than 200 residential units.

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

Consistent. The Project Site is currently developed with commercial/retail and medical office uses. Existing uses on site include a one-story print shop occupied by Sharp Printing, an asphalt-paved vehicle parking lot, a two-story medical office building occupied by La Brea Urgent Care/The Sleep Institute, a two-story retail fabric store occupied by Mood Fabrics, and a two-story commercial building. There are no residential dwelling units on the Project Site. Therefore, the development of the Proposed Project would not result in the loss of affordable housing units within the Project Site and surrounding area.

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

Consistent. The Proposed Project would include an 8-story mixed-use building with 201,123 square feet of developed floor area as defined by the LAMC. The Proposed Project's total building gross floor area is 311,930 (gsf), with a maximum of 41,967 gsf footprint on the subterranean parking levels. The gross building floor area

on Levels 1 through 8 range from 30,738 gsf (on Level 1) to 18,415 gsf (on Level 2). The proposed 8-story building would include 311,930 gross building area. Therefore, the Proposed Project would not include a single-level building that exceeds 75,000 square feet.

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

Consistent. 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. The SCAG's measures are not prescriptive on the Proposed Project, but nonetheless, the mitigation measures to be incorporated as conditions of approval for the Proposed Project are consistent with those applicable measures suggested in SCAG's MMRP, detailed below (refer to Section 4.0, Project Consistency with SCAG 2016-2040 RTP/SCS Mitigation Measures for a full discussion of the Proposed 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 Proposed Project.

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

Consistent. The properties surrounding the Project Site include commercial/retail, residential, and office land uses. There are no industrial or warehouse buildings located in the immediate vicinity of the Project Site. Therefore, the Proposed Project would not conflict with any operating industrial uses.

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

Consistent. The Project Site is designated as a Transit Priority Area and is within ¼-mile (walking distance) of major transit stops at the intersection of La Brea Avenue/6th Street and Wilshire Boulevard/La Brea Avenue. La Brea Avenue, Wilshire Boulevard, and 6th Street are served by several bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) with headways of 15 minutes or less, which include Metro lines: 20, 212, and 720. Additionally, a Metro Purple Line railway station is currently under construction immediately adjacent to the south of the Project Site at the intersection of Wilshire Boulevard and La Brea Avenue. Therefore, the Proposed Project is located within ¼-mile of a high-quality transit corridor and the future Wilshire Boulevard and La Brea Avenue Metro Purple Line station.

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

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

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

(B) The transit priority project developer provides sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of the housing units for very low, low-, and moderate-income households at monthly housing costs with an affordable housing

cost or affordable rent, as defined in Section 50052.5 or 50053 of the Health and Safety Code, respectively, for the period required by the applicable financing. Rental units shall be affordable for at least 55 years. Ownership units shall be subject to resale restrictions or equity sharing requirements for at least 30 years.

Consistent. The Project substantially complies with all applicable provisions of LAMC Section 12.22.A.31 and the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (added by Ordinance No. 184,745). Of the 121 dwelling units, 14 units would be restricted for Extremely Low Income households, which is equivalent to 11% of the total residential units. Therefore, the Proposed Project would meet the criteria of PRC Section 2155.1(c)(1)(A).

The Applicant will enter into a housing regulatory agreement memorializing these requirements and making them binding on any successors or assigns for the regulatory period of 55 years. Thus, the Project would meet the criterion of Section 21155.1(c)(1)(B).

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

Consistent. The Applicant is proposing to provide 14 units on-site that would be restricted for Extremely Low Income households, which is equivalent to 11% of the total residential units being developed on-site. As such, the developer has meet the criteria of paragraph 1 and is not subject to in lieu fees under this subsection.

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

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

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

The Proposed Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Proposed Project is consistent with SCAG policies. The Proposed Project would be consistent with applicable goals and policies presented within SCAG's 2016-2040 RTP/SCS. Refer to the table below for the Proposed Project's consistency analysis.

Consistency Analysis with the 2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
2016-2040 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 not does apply to the Proposed Project.
2016-2040 RTP/SCS Goal 2 Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** The Project Site is located in a highly urbanized area within the City of Los Angeles within a High Quality Transit Area (as defined by SCAG). The Proposed Project would develop 121 residential dwelling units, 125 hotel units, and 13,037 square feet of commercial area within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is currently served by a total of six local and inter-city transit operators including one Metro Rapid bus line 720, three Metro Local Bus lines 20, 212, and 312, LADOT DASH Fairfax, and the Antelope Valley Transit Authority (AVTA) line 786. Additionally, Metro bus lines provide transfer opportunities to the Wilshire/Western Purple Line Metro Station, located to the east of the Project Site. A Metro Purple Line railway station is currently under construction immediately to the south of the Project Site, with a completion date projected for 2023. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
2016-2040 RTP/SCS Goal 3 Ensure travel safety and reliability for all people and goods in the region.	**Consistent.** The Proposed Project would improve the public sidewalks adjacent to the Project Site and would include active ground floor commercial uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project would provide 139 bicycle spaces to promote travel by bicycle and public transportation. Furthermore, the Proposed Project would be reviewed by the Department of Building and Safety, the Los Angeles Fire Department, and the Los Angeles Department of Transportation to ensure that all access roads, driveways and parking areas would not create a design hazard to local roadways.
2016-2040 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 Proposed Project. The 2016-2040 RTP states, "A transportation system is

Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
	sustainable if it maintains its overall performance over time in an equitable manner with minimum damage to the environment, and at the same time does not compromise the ability of future generations to address their transportation needs. Sustainability, therefore, pertains to how our decisions today impact future generations. One of the measures used to evaluate system sustainability is the total inflation-adjusted cost per capita to maintain our overall multimodal transportation system performance at current conditions. The 2016 RTP/SCS includes two additional new measures to support this outcome: State Highway System pavement condition and local roads pavement condition."[2] The Project Site is located less than ¼ mile from major transit stops along Wilshire Boulevard, 6th Street, and La Brea Avenue. Additionally, the Wilshire/La Brea Metro station is currently under construction, immediately south of the Project Site. The Project Site's location would help to reduce vehicle-miles-traveled. Therefore, the Proposed Project would promote a sustainable regional transportation system.
2016-2040 RTP/SCS Goal 5 Maximize the productivity of our transportation system.	**Consistent.** The Proposed Project includes 121 residential units, 125 hotel rooms, and 13,037 square feet of commercial uses. Given the Proposed Project's location close to transit, the Project will encourage the utilization of transit as a mode of transportation to and from the Project area. Thus, the Proposed Project will contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. Moreover, the Project Site is located less than ¼ mile from major transit stops along Wilshire Boulevard, 6th Street, and La Brea Avenue. Additionally, the Wilshire/La Brea Metro station is currently under construction, immediately south of the Project Site. The Project Site's location would help to reduce vehicle-miles-traveled and promote the use of the public transportation system.
2016-2040 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 Proposed Project would place dwelling units, hotel guest rooms, and ground-floor commercial space in a Transit Priority Area. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project would improve the public sidewalks adjacent to the Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project would provide 139 bicycle spaces to promote travel by bicycle. Thus, the Proposed Project would reduce vehicles-per-

[2] *SCAG, 2016-2040 RTP/SCS, April 2016 (page 164).*

Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
	miles traveled and help improve air quality. The Proposed Project supports active transportation.
2016-2040 RTP/SCS Goal 7 Actively encourage and create incentives for energy efficiency, where possible.	**Consistent.** The Proposed Project would comply with the City of Los Angeles Green Building Code, the California Green Building Code, and include requirements for a green or high albedo roof and that at least five percent of all parking spaces on-site shall include electric vehicle (EV) charging stations.
2016-2040 RTP/SCS Goal 8 Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent.** The Project Site is located in a highly urbanized area of Los Angeles within a HQTA (as defined by SCAG) and a Transit Priority Area (as defined by SB 743). The Project Site is located less than ¼ mile from major transit stops along Wilshire Boulevard, 6th Street, and La Brea Avenue. Additionally, the Wilshire/La Brea Metro station is currently under construction, immediately south of the Project Site. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The Proposed Project would develop dwelling units, hotel guest rooms, and commercial uses near mass transit and in close proximity to services, retail stores, and employment opportunities. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
2016-2040 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.
2016-2040 RTP/SCS Guiding Policy 1 Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	**Not Applicable.** This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to the individual development projects.
2016-2040 RTP/SCS Guiding Policy 2 Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	**Not Applicable.** This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Proposed Project would contribute to a safe, well maintained, and efficient multimodal transportation system. The Proposed Project would provide landscaping along the public right-of-way and active ground floor uses, which promotes and supports pedestrian activity in the area. The Project Site is located less than ¼ mile from major transit stops along Wilshire Boulevard, 6th Street, and La Brea Avenue. Additionally, the Wilshire/La Brea Metro station is currently under construction, immediately south of the Project Site. Therefore, the Proposed Project would promote the use of the public transportation system.
2016-2040 RTP/SCS Guiding Policy 3 RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project. The Proposed Project would develop 121 dwelling units, 125 hotel rooms, and 13,037 square feet of commercial area within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The Project Site's location near mass transit and proximity to services, retail stores, and employment

Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
	opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Therefore, the Proposed Project would provide mixed commercial/residential uses in transit-rich areas near services, retail, and employment opportunities.
2016-2040 RTP/SCS Guiding Policy 4 Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	**Not Applicable.** This policy is directed towards transportation investment by SCAG. However, the Proposed Project would support active transportation (e.g. walking and bicycling) by providing landscaping along the public rights of way and active ground floor uses, which promotes and supports pedestrian activity in the area. Additionally, the Proposed Project's location within a HQTA promotes the use of public transit and pedestrian activity.
2016-2040 RTP/SCS Guiding Policy 5 HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	**Not Applicable.** This policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Although this policy is not applicable to the Proposed Project, the Proposed Project's location in a HQTA promotes the use of public transit and pedestrian activity.
2016-2040 RTP/SCS Guiding Policy 6 The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	**Not Applicable.** This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. Nevertheless, the Proposed Project is located within a HQTA (as defined by SCAG) and a Transit Priority Area (as defined by SB 743). The Proposed Project would support public transportation and other alternative methods of transportation (e.g., walking and biking).
2016-2040 RTP/SCS Guiding Policy 7 The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.	**Not Applicable.** This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments.
2016-2040 RTP/SCS Guiding Policy 8 Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.	**Not Applicable.** This policy is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project.
2016-2040 RTP/SCS Land Use Policy 1 Identify regional strategic areas for infill and investment.	**Not Applicable.** This policy is directed towards SCAG to identify regional strategic areas. The Proposed Project is an infill development in a HQTA (defined by SCAG) and within a Transit Priority Area (as defined by SB 743). The Proposed Project would be providing dwelling units, hotel guest rooms, and commercial uses in a highly urbanized area within the City of Los Angeles.

Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Land Use Policy 2 Structure the plan on a three-tiered system of centers development.[3]	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not apply to the Proposed Project.
2016-2040 RTP/SCS Land Use Policy 3 Develop "Complete Communities."	**Consistent.** SCAG describes the development of "complete communities" to provide areas that encourage households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.[4] As stated above, the Proposed Project would develop a mixed-use project with dwelling units, hotel rooms, and ground-floor commercial space in a HQTA (defined by SCAG) and within a Transit Priority Area (as defined by SB 743). The Project Site's location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Therefore, the Proposed Project would be consistent with the SCAG's goals of increasing mixed commercial/residential uses in high-quality transit areas near services, retail, and employment opportunities to reduce vehicle-miles traveled.
2016-2040 RTP/SCS Land Use Policy 4 Develop nodes on a corridor.	**Not Applicable.** The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and City goals to identify and develop locations that promote nodes. The Proposed Project is located within a HQTA and a Transit Priority Area. The Proposed Project's mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities.
2016-2040 RTP/SCS Land Use Policy 5 Plan for additional housing and jobs near transit.	**Consistent.** As stated above, the Proposed Project would place dwelling units, hotel guest rooms, and ground-floor commercial space in a HQTA and a Transit Priority Area. The Project Site is located less than ¼-half mile from major transit stops along Wilshire Boulevard,

[3] *The 2016-2040 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012-2035 RTP/SCS. The complete language from the original SCAG Advisory Land Use Policies is "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pages 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.*

[4] *SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).*

Consistency Analysis with the
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Goals and Policies	Consistency Assessment
	La Brea Avenue, and 6th Street. Additionally, the Wilshire/La Brea Metro Station for the Purple Line is currently under construction immediately south of the Project Site. Therefore, the Project Site's location would promote the use of a variety of transportation options, which includes walking, biking, and the use of public transportation.
2016-2040 RTP/SCS Land Use Policy 6 Plan for changing demand in types of housing.	**Consistent.** The Proposed Project would increase the housing stock in the Wilshire Community Plan area by providing 121 new residential units with a range of one and three-bedroom units. Of the 121 dwelling units, 14 units would be restricted for Extremely Low Income households, which is equivalent to 11% of the total residential units. Thus, the Proposed Project would contribute to the range of housing choices available in the City and is therefore consistent with this goal.
2016-2040 RTP/SCS Land Use Policy 7 Continue to protect stable, existing single-family areas.	**Not Applicable.** This Land Use Policy is not applicable to the Proposed Project because the Proposed Project would not demolish any existing single-family homes. Additionally, the Project Site is not immediately located near any low-density residential neighborhoods.
2016-2040 RTP/SCS Land Use Policy 8 Ensure adequate access to open space and preservation of habitat.	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not apply to the Proposed Project. The Proposed Project is located within an urbanized area within the City of Los Angeles. Development of the Proposed Project would not remove any existing open space areas or habitat, since the Project Site is fully developed, with four office/commercial buildings. The Proposed Project would provide 10,256 square feet of open space that equals the required amount pursuant to the LAMC with an allowed 25 percent reduction per the TOC Guidelines.
2016-2040 RTP/SCS Land Use Policy 9 Incorporate local input and feedback on future growth.	**Not Applicable.** This Land Use Policy is directed towards SCAG and not does apply to the Proposed Project.
2016-2040 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 Proposed Project will provide multi-family housing and job-creating commercial uses to an existing, transit-accessible area. In addition, the Proposed Project will provide 139 bicycle parking and various pedestrian-oriented improvements, including improved sidewalks and active ground floor uses.
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 not does apply to the Proposed Project. The Proposed Project is an infill, mixed-use project located within a HQTA, thereby decreasing time and cost of traveling between places.
2016 RTP/SCS Benefit 3: The RTP/SCS is expected to result in less energy and water	**Consistent.** The Proposed Project includes numerous energy-efficient design features, such as energy star

Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
consumption across the region, as well as lower transportation costs for households.	rated appliances. It will comply with the City of Los Angeles Green Building Code, the California Green Building Code, and includes requirements for a green or high albedo roof and that at least five percent of all parking spaces on-site shall include electric vehicle (EV) charging stations. As demonstrated in the Title 24 Energy Performance Report (included as Attachment F.1 to this document) the Proposed Project would exceed Title 24 performance standards by 15.47 percent. Additionally, as demonstrated in the Total Water Use Reduction Report (see Attachment F.2) the total water consumption of the proposed building is 73 percent of a typical building of the same size. The Proposed Project's incorporation of bicycle-and pedestrian-friendly elements and location near various bus lines will also provide future residents with various affordable transportation options and reduce vehicle miles traveled.
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 Proposed Project will encourage improved access and mobility by providing both residential and commercial uses on a single site. In addition, the Proposed Project's access to various transit options will encourage the use of existing and proposed mass transit. The Proposed Project also includes 10,256 square feet of open space including 31 trees. Recreational amenities would include one swimming pool and sun terrace area on Level 8, an outdoor terrace, a barbeque pit and lounge seating. These areas provide the opportunity for Project residents, and patrons of the hotel and restaurant space to gather.
Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016.	

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 Proposed Project's consistency with the SCAG MMRP's Project-level mitigation measures. All Performance Standards 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 *Scenic Vista*	Project-Level Mitigation Measure **MM-AES-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to "break up" large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that 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.	This Mitigation Measure is not relevant to the Proposed Project as Public Resources Code 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." The Proposed Project is a mixed-use residential and commercial infill development project with 121 dwelling units, 125 hotel rooms, and 13,037 square feet of commercial uses. The Project Site is located immediately adjacent to the future Wilshire/La Brea Metro station (currently under construction) and from major transit stops at the intersection of La Brea Avenue/6th Street and Wilshire Boulevard/La Brea Avenue. La Brea Avenue, Wilshire Boulevard, and 6th Street are served by several bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) with headways of 15 minutes or less during the peak commute hours, including Metro lines: 20, 212, and 720. Therefore, the Proposed Project is located in a Transit Priority Area as defined in Public Resources Code Section 21099. The Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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.	
Aesthetics *Visual Character/Quality*	Project-Level Mitigation Measure **MM-AES-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • 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	This Mitigation Measure is not relevant to the Proposed Project as Public Resources Code 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." The Proposed Project is a mixed-use residential and commercial infill development project with 121 dwelling units, 125 hotel rooms, and 13,037 square feet of commercial uses. The Project Site is located immediately adjacent to the future Wilshire/La Brea Metro station (currently under construction) and from major transit stops at the intersection of La Brea Avenue/6th Street and Wilshire Boulevard/La Brea Avenue. La Brea Avenue, Wilshire Boulevard, and 6th Street are served by several bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) with headways of 15 minutes or less during the peak commute hours. Therefore, the Proposed Project is located in a Transit Priority Area as defined in Public Resources Code Section 21099. The Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. • Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.	
Aesthetics *Light/Glare/Shade*	Project-Level Mitigation Measure **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. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.	This Mitigation Measure is not relevant to the Proposed Project as Public Resources Code 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." The Project Site is located immediately adjacent to the future Wilshire/La Brea Metro station (currently under construction) and from major transit stops at the intersection of La Brea Avenue/6th Street and Wilshire Boulevard/La Brea Avenue. La Brea Avenue, Wilshire Boulevard, and 6th Street are served by several bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) with headways of 15 minutes or less during the peak commute hours. Therefore, the Proposed Project is located in a Transit Priority Area as defined in Public Resources Code Section 21099. The Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

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

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

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

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

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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.	
Agriculture and Forestry *Zoning for Ag Use, Williamson Act Contract*	Project-Level Mitigation Measure **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 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.	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is not zoned for agricultural production, there is no farmland on the Project Site, and there are no Williamson Act Contracts in effect for the Project Site.
Air Quality	Project-Level Mitigation Measure	

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Potential to Violate AQ Standard	**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. • 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.	The Proposed Project substantially conforms with this Mitigation Measure as it is subject to regulatory compliance 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: • Air Quality (Site Clearing, Grading and Construction Activities): Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: o All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. o The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. o All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. o All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. o All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. o General contractors shall maintain and operate

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. • Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators. • Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through- traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. • As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. • Implement EPA's National Clean Diesel Program. • Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible. • On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity. • If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines. • Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines • Convert part of the construction truck fleet to natural gas. • Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts	construction equipment so as to minimize exhaust emissions. ○ Trucks having no current hauling activity shall not idle but be turned off. • The Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. • The Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/ Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). • In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. • In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards. • The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings. • The Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road) • Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas • Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner offroad 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. • 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	• The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138. • New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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 Quality *Expose Sensitive Receptors to Pollutants*	Project-Level Mitigation Measure **MM-AIR-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects would be located. Where the Lead Agency has identified that a project has the potential to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s), or other comparable measures, to reduce cancer risk pursuant to the Air Toxics "Hot Spots" Act of 1987 (AB2588), as applicable and feasible. Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB's strategy includes the following elements: • 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 o Improvements and Enhancements to California's Smog Check Program o Expanded Passenger Vehicle Retirement o Modifications to Reformulated Gasoline Program o Cleaner In-Use Heavy-Duty Trucks	This Mitigation Measure is not relevant to the Project, as the Proposed Project does not involve a 2016-2040 RTP/SCS transportation project. As a mixed-use development, the Proposed 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.

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	○ Ship Auxiliary Engine Cold Ironing and Other Clean Technology Cleaner Ship Main Engines and Fuel ○ Port Truck Modernization ○ Accelerated Introduction of Cleaner Line-Haul Locomotives ○ Clean Up Existing Commercial Harbor Craft ○ Limited idling of diesel-powered trucks ○ Consolidated truck trips and improve traffic flow ○ Late model engines, Low emission diesel products, engine retrofit technology ○ Alternative fuels for on-road vehicles Off-Road Sources ○ Cleaner Construction and Other Equipment ○ Cleaner In-Use Off-Road Equipment ○ Agricultural Equipment Fleet Modernization ○ New Emission Standards for Recreational Boats ○ Off-Road Recreational Vehicle Expanded Emission Standards	
Biological Resources *Adverse Effect on Candidate, Sensitive, or Special Status Species, Adverse Effect on Riparian Habitat or Other Sensitive Natural Community, Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting*	Project-Level Mitigation Measure **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	This Mitigation Measure is not relevant to the Proposed Project as the Project Site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City. The Project Site is improved with four office/retail buildings. Nevertheless, the City has required the following regulatory compliance measure which are consistent with the SCAG EIR mitigation measures, as it is equal to or more effective than SCAG RTP/SCS Program EIR MM-BIO-12(b). with regard to avoiding potentially significant effects related to nesting native birds that are in the jurisdiction and responsibility of the City: • Habitat Modification (Nesting Native Birds)

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Biological Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan	critical habitat, wherever practicable and feasible. • Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an Incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to protect the survival and recovery in the wild of federally and state-listed endangered species including the bald eagle: o Avoidance strategies o Contribution of in-lieu fees o Use of mitigation bank credits o Funding of research and recovery efforts o Habitat restoration o Conservation easements o Permanent dedication of habitat o Other comparable measures • Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. • Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. • Appoint an Environmental Inspector to monitor implementation of mitigation measures. • Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. • Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance. • Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	o Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86). o If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall: o Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work. o If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31. o Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
		nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area. o The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.
Biological Resources *Adverse Effect on Riparian Habitat or Other Sensitive Natural Community, Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Biological Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **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-	This Mitigation Measure is not relevant to the Proposed Project as the Project Site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City. The Project Site is improved with four office/commercial buildings.

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

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

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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.	
Biological Resources *Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Biological Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **MM-BIO-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 404 of the Clean Water Act and regulations of the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • 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	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is not located on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies.

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. 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: o Permitee-responsible mitigation o Contribution of in-lieu fees o 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.	
<u>Biological Resources</u> *Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Biological Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or*	<u>Project-Level Mitigation Measure</u> **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	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is not located within or adjacent to migratory fish, wildlife species, or established native resident and/or migratory wildlife corridors, and native wildlife nursery sites. The Project Site is improved with four office/commercial buildings and is located in an urbanized area of the City.

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

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

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

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

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	measures may include the following measures, in addition to the measures outlined in **MM-BIO-1(b)**, where applicable: o Wildlife movement buffer zones o Corridor realignment o Appropriately spaced breaks in center barriers o Stream rerouting o Culverts o Creation of artificial movement corridors such as freeway under- or overpasses o Other comparable measures • Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. • Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species. • Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.	
Biological Resources *Conflict with Local Policies or Ordinances Protecting Biological Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or*	Project-Level Mitigation Measure **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	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is completely paved and developed, and no significant vegetation exists, including protected trees. No protected biological resources or tree species, such as oak trees, currently exist on the Project Site. As such, none of the mitigation measures that pertain to local policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance, are applicable.

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Other Conservation Plan	applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. • Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist. • If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species. • Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. • Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. • Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.	

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• 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 ○ Other comparable measures	
Biological Resources *Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **MM-BIO-6(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible. 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	This Mitigation Measure is not relevant to the Proposed Project as no locally designated natural communities are known to occur on or adjacent to the Project Site. Therefore, none of the mitigation measures that pertain to Habitat Conservation Plans or Natural Community Conservation Plans are applicable to the Proposed Project.

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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 *Potential to Destroy Unique Paleontological Resources or Unique Geological Features*	Project-Level Mitigation Measure **MM-CUL-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. 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	This Mitigation Measure is not incorporated because the City has determined that the following regulatory compliance measure, which is capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features, are equal to or more effective than the SCAG RTP/SCS Program EIR MM-CUL-1(b): Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and: • The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. • The paleontologist's survey, study or report shall contain a recommendation(s), if necessary,

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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: o 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. o Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP. o 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. o 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.	for the preservation, conservation, or relocation of the resource. • The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report. • Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
<u>Cultural Resources</u> *Substantial Adverse Change in Significance*	<u>Project-Level Mitigation Measure</u> **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	The Proposed Project would include the following Performance Standard as a condition of approval, which is consistent with the SCAG RTP/SCS Program EIR MM-CUL-2(b)CUL in

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

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
of a Historical Resource, Substantial Adverse Change in the Significance of an Archaeological Resource	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: • 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: o Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and	avoiding potential impacts to inadvertent finds of historic, archeological, or tribal cultural resources: • Performance Standard CR-1 (Cultural Resources): Prior to the commencement of ground disturbing activities, a Cultural Resources Monitoring Plan (Monitoring Plan) shall be prepared. The Monitoring Plan shall include, but not be limited to, monitoring protocol for ground-disturbing activities; a construction worker training program; and discovery and processing protocol for inadvertent discoveries of cultural resources or Tribal Cultural Resources. The plan shall identify the areas of sensitivity determined for cultural resources and Tribal Cultural Resources that require monitoring and detail a protocol for determining circumstances in which additional, or reduced levels of monitoring (e.g., spot checking) may be appropriate. Specifically, the Monitoring Plan shall include a framework for assessing the geoarchaeological setting to determine whether undisturbed sediments (i.e., 'native' sediments) capable of preserving archaeological remains are present adjacent to or beneath those sediments disturbed by urban development, and the depth at which these sediments would no longer be capable of containing archaeological material and thereby cease to require an archaeological monitoring to be present. Because of the overall sensitivity for archaeological resources affiliated with Native American occupation, the Monitoring Plan shall consider the extent of existing disturbances and determine the presence of cultural resources within those or surrounding native sediments. The plan shall identify the process for contacting tribal groups in the event of inadvertent discovery of archaeological resources, Tribal

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. ○ Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. • Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource. • Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site. • Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified. • Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. • If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. • Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated.	Cultural Resources, or human remains. • Performance Standard CR-2 (Archaeological Resources): In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	• Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.	
Cultural Resources *Disturb Human Remains*	Project-Level Mitigation Measure **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. • If any discovered remains are of Native American origin: o 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. o 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	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance measure, which is capable of avoiding or reducing significant impacts 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: • Cultural Resources (Human Remains): If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed: o Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays) o If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). o The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. o The most likely descendent has 48 hours to make

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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: ▪ The Native American Heritage Commission is unable to identify a descendent; ▪ The descendant identified fails to make a recommendation; or ▪ 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.	recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. o If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.
Energy *Increase Residential Energy Use, Increase Building Energy Use*	Project-Level Mitigation Measure **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: o Use energy efficient materials in building design, construction, rehabilitation, and retrofit. o Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. o Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight. o Incorporate passive environmental control systems that account for the characteristics of the natural environment. o Use high-efficiency lighting and cooking devices.	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance measure(s), which is 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: • Energy (Green Building Code): In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Building Code and as it may be subsequently amended or modified.

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	○ Incorporate passive solar design. ○ Use high-reflectivity building materials and multiple glazing. ○ Prohibit gas-powered landscape maintenance equipment. ○ Install electric vehicle charging stations. ○ Reduce wood burning stoves or fireplaces. ○ Provide bike lanes accessibility and parking at residential developments.	
Geology and Soils *Adverse Effects due to Earthquake or Other Seismic Activity, Unstable Geologic Unit or Soil, Expansive Soil*	Project-Level Mitigation Measure **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 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	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance measure(s), which is 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: • Geology (Seismic): The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety. • Geology (Geotechnical Investigation): The Proposed Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified. The Project Geotechnical Investigation is included as Attachment D to this document.

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	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, 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.	
<u>Geology and Soils</u> *Soil Erosion or Loss of Topsoil*	<u>Project-Level Mitigation Measure</u> **MM-GEO-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable	The Project already substantially conforms with this Mitigation Measure as it is subject to the following

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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 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: o File a Notice of Intent (NOI) with the SWRCB. o 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. o 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	regulatory compliance measure(s), which are 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: • Geology (Erosion/Grading/Short-Term Construction Impacts): The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor. • Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following: o Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity. o Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. • Hydrology (National Pollutant Discharge Elimination System General Permit): Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	completion of the project. o 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.	Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Proposed Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. The Project Geotechnical Investigation is included as Attachment D to this document.
<u>Greenhouse Gases</u> *Cumulative Impacts, Forest Land Conversion*	<u>Project-Level Mitigation Measure</u> **MM-GHG-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases**,** the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse	The Project already substantially complies with this Mitigation Measure because it incorporates project design features, or is subject to regulatory compliance measures, that are 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. Such features and measures include the following: • The Proposed Project is located on an infill development site that is currently improved with four buildings with office/commercial uses. The Project Site is also

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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: o 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; o Use alternative (non-petroleum based) fuels; o Deployment of zero- and/or near zero emission technologies as defined by CARB; o Use lighting systems that are energy efficient, such as LED technology; o Use the minimum feasible amount of GHG-emitting construction materials that is feasible; o Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production; o Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse; o Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy; o Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption; o Use lighter-colored pavement where feasible; o Recycle construction debris to maximum extent feasible; o Protect and plant shade trees in or near	located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development. • The Project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the multi-family dwelling units. • The Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. • As mandated by the LA Green Building Code, the Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. • The Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy. • The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use. • The Project would include a minimum of five percent of the total number of parking spaces to include Electric Vehicle (EV) Charging Stations.

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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, 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.	• The Project would be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS which are based on changing the region's land use and travel patterns: ○ Compact growth in areas accessible to transit; ○ More multi-family housing; ○ Jobs and housing closer to transit; ○ New housing and job growth focused in High Quality Transit Areas (HQTA); and ○ Biking and walking infrastructure to improve active transportation options, transit access. • Greenhouse Gas Emissions (Green Building Code): In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.
<u>Hazards and Hazardous Materials</u> *Significant Hazard due to Routine Transport, Use, or Disposal of*	<u>Project-Level Mitigation Measure</u> **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	The Proposed Project would include the following Performance Standard as a condition of approval, which are consistent with the SCAG EIR mitigation measures as they are capable of avoiding or reducing the significant effects related to a project

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Hazardous Materials, Reasonably Foreseeable Upset and Accident Conditions, Hazardous Emissions or Materials Near School	Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. • Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. • Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials. • Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project. • Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: o The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. o The location of such hazardous materials. o An emergency response plan including employee training information. o A plan that describes the manner in which	placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies: • Performance Standard HAZ-1 (Dewatering and Groundwater Management Plan): o A Dewatering and Groundwater Management Plan (DGMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated groundwater can be properly handled, treated, and disposed of at a licensed disposal facility. Proper handling of the contaminated groundwater would be required regardless of the contamination source. o In the unlikely event that contaminated groundwater is discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.

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	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.	
Hazards and Hazardous Materials *Located on a Hazardous Materials Site Section 65962.5*	Project-Level Mitigation Measure **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	The Proposed Project would include the following condition of approval, which is consistent with the SCAG EIR mitigation measures as it is 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: • Performance Standard HAZ-1 (Dewatering and Groundwater Management Plan): o A Dewatering and Groundwater Management Plan (DGMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated groundwater can be properly handled, treated, and disposed of at a licensed disposal facility. Proper handling of the contaminated groundwater would be required regardless of the contamination source. o In the unlikely event that contaminated groundwater is discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use,

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. • Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. • Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. • Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. • Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. • Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. • Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate	containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy. • Performance Standard HAZ-2 (Asbestos-Containing Materials and Lead-Based Paint): o Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529). o Disturbance of any LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and the US Department of Housing and Urban Development (HUD) and 2010 Toxic Substances Control Act (TSCA) Renovation, Repair and Painting Rule (RRP) in pre-1978 target housing and child-occupied facilities. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. • Project Condition HAZ-3 (Methane Report): o Due to the potential environmental risk associated with construction in Methane Buffer Zones, a Methane Assessment Report shall be conducted prior to the redevelopment of the Project Site.

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	regulatory oversight authority. • Use best management practices (BMPs) regarding potential soil and groundwater hazards. • Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. • Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. • Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. • Develop, train, and implement appropriate worker awareness and protective 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	

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	or federal law. • Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. • Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
Hazards and Hazardous Materials *Wildland Fire Risk*	Project-Level Mitigation Measure **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	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is located in a fully urbanized area and there are no wildlands in the vicinity. Furthermore, the Proposed Project is subject to regulatory compliance measures, such as adherence to fire code requirements.

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	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 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	Project-Level Mitigation Measure **MM-HYD-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG	The Proposed Project already substantially conforms with this

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Violate Water Quality Standards or Waste Discharge Requirements, Alteration of Site Drainage Pattern, Runoff Exceeding Stormwater Drainage System Capacity, Otherwise Degrade Water Quality	has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: ◊ • Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. • Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. • Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. • Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. • Ensure adequate capacity of the surrounding 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: o 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. o Regional Walter Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above. o California Department of Fish and Wildlife	Mitigation Measure as it is subject to the following regulatory compliance measure(s), which are 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: • Hydrology (National Pollutant Discharge Elimination System General Permit): Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Proposed Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. • Hydrology (Stormwater Pollution (Demolition, Grading, and Construction Activities): Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.

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	(CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW. • Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. • Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. • Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies. • Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. • Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. • Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. • Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters.	○ Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. ○ All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills. ○ Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible. ○ Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting. • Hydrology (Standard Urban Stormwater Mitigation Plan): Prior to the issuance of a grading permit, the Project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

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	• Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel. • Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. • Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible. • If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.	
Hydrology and Water Quality *Deplete Groundwater Supply or Interfere with Groundwater Recharge*	Project-Level Mitigation Measure **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	The Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance measure(s), which are 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: • Hydrology (Dewatering): If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under

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	groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. • Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. • Hydrology (Low Impact Development Plan): Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. • Hydrology (Best Management Practices): The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, which ever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.
Hydrology and Water Quality *Structures within a 100-Year Floodplain Hazard Area, Risk due to Levee or Dam Failure, Risks due to Seiche, Tsunami, or Mudflow*	Project-Level Mitigation Measure **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	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is not, according to the Federal Emergency Management Agency (FEMA) flood insurance rate map, located within a designated flood zone.

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	and should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program. • Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	
Land Use and Planning *Conflict with Applicable Land Use Plan, Policy, or Regulation*	Project-Level Mitigation Measure **MM-LU-1(b)**: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency: • Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.	This Mitigation Measure is not relevant as the Proposed Project would not conflict with local and regional plans applicable to the Project Site. Additionally, the Project already substantially complies with this Mitigation Measure because it incorporates the following project design features regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Proposed Project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies: • The Proposed Project includes a mix of uses, including dwelling units, hotel guest rooms, and commercial space, which is consistent with the existing pattern of development in the vicinity.

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Land Use and Planning
Physically Divide a Community
	Project-Level Mitigation Measure
	MM-LU-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:
	
	• Consider alignments within or adjacent to existing public rights-of-way.
	• Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
	• Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
	• Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods.
	• Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
	  ○ 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
		For permanent impacts relating to physically dividing a community, this mitigation measure is not relevant as the Proposed Project does not result in new right-of-way alignments or street vacations. The Proposed Project would replace four existing office and commercial buildings and will provide all required street dedications and improvements.
		
		For any temporary impacts related to construction, the City imposes the following Performance Standard as a condition of approval for the Proposed Project, which is consistent with the SCAG EIR mitigation measures as they avoid or reduce the significant effects related to the physical division of an established community during construction:
		
		• Performance Standard TR-2: (Construction Management Plan):
		  ○ A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.
		  ○ All delivery truck loading and unloading shall take place on site.
		  ○ The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

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	community facilities.	○ Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. ○ Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. ○ The Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
Mineral Resources *Loss of Availability of a Known Mineral Resource*	Project-Level Mitigation Measure **MM-MIN-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with SMARA, California Department of Conservation regulations, local general plans, specific plans, and other laws and regulation governing mineral or aggregate resources, as applicable and feasible. Such measures may include the following, other comparable measures identified by the Lead Agency: • 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	The Project Site is zoned C2-1. The Project Site is not located within a Mineral Resources Zone 2 (MRZ-2).[5] The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. The Project Site is currently developed with four office/commercial buildings. Development of the Project Site would not block or hinder access or availability of mineral resources. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource, and no impact would occur, and no mitigation is required.

[5] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

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	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: o Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. o Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. o Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. o Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Noise *Exposure of Persons to Noise in Excess of Local Standards, Excessive Groundborne Vibration or Noise Levels, Substantial Permanent Increase in Noise Level, Substantial Temporary Increase in Noise Levels*	Project-Level Mitigation Measure **MM-NOISE-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor's Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Install temporary noise barriers during	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance measures that avoid or reduce the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies: • The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. • The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Designate an on-site construction complaint and enforcement manager for the project. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic	provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. Additionally, the City imposes the following Performance Standards as conditions of approval, which are consistent with the SCAG EIR mitigation measures as they will avoid or reduce the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies: • Increased Noise Levels (Demolition, Grading, and Construction Activities) ○ Performance Standard N-1: Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday. ○ Performance Standard N-2: To the maximum extent possible, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. ○ Performance Standard N-3: The project contractor shall use power construction equipment with noise shielding and muffling devices. ○ Performance Standard N-4: The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of

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	tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors. • Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors. • Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible. • Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way. • Use noise barriers to protect sensitive receptors from excessive noise levels 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.	construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 10-dBA reduction in sound level. ○ Performance Standard N-5: During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent residential land uses does not exceed 5 dBA over the ambient noise levels. ○ Performance Standard N-6: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.
Noise *Exposure of Persons to Excessive Groundborne Vibration or Noise Levels*	Project-Level Mitigation Measure **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	The Proposed Project would implement the Performance Standards N-1 through N-6 above as conditions of approval, which is consistent with the SCAG EIR mitigation measure as they avoid or reduce the significant effects of vibration impacts that are in the

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	that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Federal Transportation Authority and Caltrans guidance documents, county or city transportation commission, noise and vibration ordinances and general plan noise elements for the counties and cities where projects are undertaken and other health and safety regulations set forth by federal state, and local authorities that regulate vibration levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • 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.	jurisdiction and responsibility of public agencies and/or Lead Agencies.
Population and Housing *Displacement of Housing, Requiring Replacement Housing Elsewhere*	Project-Level Implementation Measures **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	This Mitigation Measure is not relevant to the Proposed Project as the Project would consist of the development of new housing and commercial land uses on a site that is currently occupied by four office/commercial buildings. No displacement of existing housing would occur with the development of the Proposed Project, and therefore, none of the suggested measures are applicable.

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	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.	
Public Services *Adverse Impacts Associated with New or Physically Altered Governmental Facilities for Public Protective Fire and Emergency Services*	Project-Level Mitigation Measure **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-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),**	This Mitigation Measure is not incorporated because existing facilities are capable of providing acceptable response times for fire protection and emergency response services. Specifically, the Los Angeles Fire Department considers fire protection services for a project adequate if a project is within the maximum response distance (1.5 miles in this instance). The Project Site is served by LAFD Station No. 61, approximately 0.6 miles northwest of the Project Site. Therefore, fire protection response with existing facilities is therefore considered adequate, and Proposed Project impacts would not be significant. Additionally, this Mitigation Measure is not incorporated because the City has determined that the following regulatory compliance measures are equal to or more effective than the SCAG RTP/SCS Program EIR MM-PS-1(b) with respect to 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: • Public Services (LAFD): The following recommendations of the

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	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.	Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: o Fire lanes, where required, shall be a minimum of 20 feet in width; o All structures must be within 300 feet of an approved fire hydrant; and o Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. • Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.
Public Services *Adverse Impacts Associated with New or Physically Altered Governmental Facilities for Public Protective Security Services*	Project-Level Mitigation Measure **MM-PS-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including:	The Proposed Project substantially conforms to this mitigation measure because existing facilities are capable of providing acceptable response times for police protection. The Project Site is currently served by the City of Los Angeles Police Department's (LAPD) West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West L.A., Wilshire, and West Traffic areas. The Wilshire Community Police Station, located at 4861 West Venice Boulevard, approximately 1.8 miles south (driving distance) from the Project Site. Additionally, the Proposed Project would implement the following Performance Standards as conditions of approval, which are consistent with the SCAG EIR mitigation measure as they avoid or reduce the significant

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	• 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), 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.	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: • Performance Standard PS-1 Public Services (Police – Demolition/Construction Sites): o Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances. • Performance Standard PS-2 Public Services (Police): o The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.
<u>Public Services</u> *Adverse Impacts Associated with New or*	<u>Project-Level Mitigation Measure</u> **MM-PS-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance

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Physically Altered Governmental Facilities for School Services	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), 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.	measures that avoid or reduce 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: • Public Services (Schools): The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.
Recreation *Increased Use or Physical Deterioration of Recreational Facilities*	Project-Level Mitigation Measure **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	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance measures that avoid or reduce 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

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	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: o Increasing the accessibility to natural areas for outdoor recreation. o Promoting infill development and redevelopment to revitalize existing communities. o Utilizing "green" development techniques. o Promoting water-efficient land use and development. o Encouraging multiple uses. o 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	other public agencies and/or Lead Agencies: • Recreation (Increased Demand for Parks or Recreational Facilities): Pursuant to Sections 12.33 and/or 17.12 of the Los Angeles Municipal Code, the Project Applicant shall pay the applicable Quimby fees for construction of dwelling units. Additionally, the Proposed Project already substantially complies with this Mitigation Measure because it incorporates the following project design features regarding recreational facilities and parks: • The Proposed Project would include 10,256 square feet of open space. Recreational amenities would include swimming pools and a roof terrace area. These areas provide the opportunity for Project residents, neighbors, and patrons of the retail space to gather.

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	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.	
Transportation/ Traffic *Conflict with Measures of Effectiveness For Performance of the Circulation System*	Project-Level Mitigation Measure **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 demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: o Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement o Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document) o Signage and striping onsite to encourage	The Proposed Project already substantially complies with this Mitigation Measure because it incorporates project design features that avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies: • As an infill mixed-use development in an urban area, the Proposed Project is expected to have a higher percentage of internal and pass-by trips. Furthermore, because of its proximity to public transit, employment, and entertainment destinations, a number of Project trips would be expected to be walk or transit trips rather than auto vehicle trips. Similarly, because the commercial components of the Proposed Project will be primarily locally serving to the Project and the surrounding area, some of the trips might be expected to be walk-ins either from the Project or the surrounding area. • The Proposed Project would include 139 on-site bicycle parking spaces, which is pursuant to the standards and requirements of the City's Bicycle Ordinance (185480, effective May 9, 2018). A bicycle maintenance area is provided. • The Proposed Project includes the following features to improve pedestrian facilities and to provide a safe and walkable pedestrian environment, to increase the number of walking trips, and provide for on-site facilities to reduce the need to make vehicle trips off-site.

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	bike safety o Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials o Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan. o Direct transit sales or subsidized transit passes o Guaranteed ride home program o Pre-tax commuter benefits (checks) o On-site car-sharing program (such as City Car Share, Zip Car, etc.) o On-site carpooling program o Distribution of information concerning alternative transportation options o Parking spaces sold/leased separately o Parking management strategies; including attendant/valet parking and shared parking spaces. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas. • Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible. • Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. • Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large 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-	o Improve sidewalks adjacent to and within the Project. o Add pedestrian amenities such as: landscaping and setbacks, shade, benches, pedestrian-scale lighting, etc, along La Brea Avenue. o Provide pedestrian-scale retail commercial uses along street frontages. o Provide an on-site transit information kiosk. o Provide on-site concierge service to facilitate use of transit, taxis, shuttles, and transportation network companies. Additionally, the City imposes the following Mitigation Measure(s) that are consistent with the SCAG EIR mitigation measures as they avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies: • Project Condition TR-1: (Construction Management Plan) o A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. o All delivery truck loading and unloading shall take place on site. o The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to

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	emitting vehicles. • Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions. • Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. • Purchase, or create incentives for purchasing, low or zero-emission vehicles. • Create local "light vehicle" networks, such as neighborhood electric vehicle systems. • Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles. • Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles. • Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives. • Project Selection: o Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. o Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. • Public Involvement: o 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: o Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. o Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. • System Monitoring:	maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. o Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. o Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. o The Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

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	○ Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency. • Arterial Traffic Management: ○ Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. • Signal Synchronization: ○ Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic. • HOV Lanes: ○ Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. • Delivery Schedules: ○ Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas. ○ Implement and supporting trip reduction programs. ○ Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives. • Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities. • Bicycle and Pedestrian Trails: ○ Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations. • Bicycle Safety Program: ○ Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers. • Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects.	

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	• Bicycle Parking:
	  ○ Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists).
	• Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:
	  ○ Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation;
	  ○ Eliminate or reduce minimum parking requirements for new buildings;
	  ○ "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space);
	  ○ Use parking pricing to discourage private vehicle use, especially at peak times;
	  ○ Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities;
	  ○ Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times;
	  ○ Encourage shared parking programs in mixed-use and transit-oriented development areas.
	• Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including:
	  ○ Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking;
	  ○ Encourage special event center operators to advertise and offer discounted transit passes with event tickets;
	  ○ Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for 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	

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	use. • Pedestrian and Bicycle Promotion: o Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. • Fleet Replacement: o 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.	
Transportation/ Traffic *Conflict with Applicable Congestion Management Program*	Project-Level Mitigation Measure **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: o Advocate for a regional, market-based system to price or charge for auto trips during peak hours. o Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. o Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or	The Proposed Project already substantially complies with this Mitigation Measure because it incorporates project design features that avoid or reduce the potential for conflicts 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: o As a mixed-use development in an urban area, the Proposed Project is expected to have a higher percentage of internal and pass-by trips. Furthermore, because of its proximity to public transit, employment and entertainment destinations, a number of Project trips would be expected to be walk or transit trips rather than auto vehicle trips. Similarly, because the commercial components of the Proposed Project will be primarily locally serving to the Project and the surrounding area, some of the trips might be expected to be walk-ins either from the Project or the surrounding area. o The Proposed Project would include 139 on-site bicycle parking spaces, which is pursuant to the standards and requirements of the City's Bicycle Ordinance (185480, effective May 9, 2018). A

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. o 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. o 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: o A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes. o Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. o Location of construction staging areas for materials, equipment, and vehicles at an approved location. o 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. o Provision for accommodation of pedestrian flow. o As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers	bicycle maintenance area is provided. • The Proposed Project includes the following features to improve pedestrian facilities and to provide a safe and walkable pedestrian environment, to increase the number of walking trips, and provide for on-site facilities to reduce the need to make vehicle trips off-site. o Improve sidewalks adjacent to and within the Project. o Add pedestrian amenities such as: landscaping and setbacks, shade, benches, pedestrian-scale lighting, etc, along La Brea Avenue. o Provide pedestrian-scale retail commercial uses along street frontages. o Provide an on-site transit information kiosk. o Provide on-site concierge service to facilitate use of transit, taxis, shuttles, and transportation network companies. Additionally, the Proposed Project is consistent with the SCAG EIR Mitigation Measure as it would avoid or reduce the potential for conflicts 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. The Proposed project would incorporate the following Condition to reduce short term construction impacts: • Performance Standard TR-1 (Construction Management Plan): o A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures,

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	do not park in on street spaces. o 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, r 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. o Any heavy equipment brought to the construction site shall be transported by truck, where feasible. o No materials or equipment shall be stored on the traveled roadway at any time. o Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion. o All equipment shall be equipped with mufflers. o 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. o 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: o Ensure transportation centers are multi-modal to allow transportation modes to intersect. o 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. o To the extent feasible, extend service and hours of operation to underserved arterials	traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. o All delivery truck loading and unloading shall take place on site. o The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. o Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. o Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. o The Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

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	and population centers or destinations such as colleges. o Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations. o Coordinate schedules and routes across service lines with neighboring transit authorities. o Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles). o 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. o 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. o Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets. o 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: o Ensure transit stops and bus lanes are safe, convenient, clean and efficient. o Ensure transit stops have clearly marked street-level designation, and are accessible. o Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate. o 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: o Develop a Regional Pass system to reduce the number of different passes and tickets required of system users. o Implement "Smart Bus" technology, using	

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	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). o 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: o Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic. o Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access. • Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: o Designate a certain percentage of parking spaces for ride-sharing vehicles. o Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles. o Provide a web site or message board for coordinating shared rides. o Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit. o 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: o Provide assistance to regional and local ridesharing organizations. o Advocate for legislation to maintain and expand incentives for employer ridesharing programs. o Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes. o Provide public recognition of effective programs through awards, top ten lists, and other mechanisms. • Implement a "guaranteed ride home" program	

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program. • Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations. • Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers. • Work with existing shuttle service providers to coordinate their services. • Facilitate employment opportunities that minimize the need for private vehicle trips, including: o Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations. o 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: o Encouraging carpools and vanpools with preferential parking and a reduced parking fee. o Institute a parking cash-out program. o Renegotiate employee contracts, where possible, to eliminate parking subsidies. o Install on-street parking meters with fee structures designed to discourage private vehicle use. o Establish a parking fee for all single-occupant vehicles. • Work with school districts to improve pedestrian and bicycle to schools and restore school bus service • Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities. • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. • Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers. • Synchronize traffic signals to reduce congestion and air quality.	

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	• Work with community groups and business associations to organize and publicize walking tours and bicycle evens. • Support legislative efforts to increase funding for local street repair.	
Transportation/ Traffic *Inadequate Emergency Access* Hazards and Hazardous Materials *Impair or Interfere with Emergency Response or Evacuation Plan*	Project-Level Mitigation Measure **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 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: o Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. o Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. o Scheduling of truck trips outside of peak morning and evening commute hours. o Limiting of lane closures during peak hours to the extent possible. o Usage of haul routes minimizing truck traffic on local roadways to the extent possible. o Inclusion of detours for bicycles and	The Proposed Project would implement the following Performance Standard as a condition of approval, which is consistent with the SCAG EIR mitigation measures as they avoid or reduce impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies: • Performance Standard TR-2 (Construction Management Plan): o A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. o All delivery truck loading and unloading shall take place on site. o The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

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Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
	pedestrians in all areas potentially affected by project construction. o Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. o Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. o Storage of construction materials only in designated areas. • 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: o Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities. o Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. o 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.	o Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. o Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. o The Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
<u>Utilities and Service Systems</u> *Require New Water or*	<u>Project-Level Mitigation Measure</u> **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	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance

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Wastewater Treatment Facilities	and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8, and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan. Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant impacts on the use of existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities.	measures that avoid or reduce the significant effects on utilities and service systems: o Utilities (Low Impact Development Plan): Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. o Utilities (Water): As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase. o Utilities (Water): The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and 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). Utilities (Water): The Proposed Project would be required to

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		provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20%. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.
Utilities and Service Systems *Require New or Expanded Entitlements for Water Supply*	Project-Level Mitigation Measure **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	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to the following regulatory compliance measures that avoid or reduce 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: ○ As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase. ○ The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and 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

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	washers, water system audits, and leak detection and repair. • Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface	the cooler months and during the rainy season). o The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20%. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.
<u>Utilities and Service Systems</u> *Landfill with Sufficient Capacity*	<u>Project-Level Mitigation Measure</u> **MM-USS-6(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: o Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. o Inclusion of a waste management plan that promotes maximum C&D diversion. o Source reduction through (1) use of	The Proposed Project already substantially conforms with this mitigation measure as it is subject to the following regulatory compliance measure that avoids or reduces 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: • Utilities (Solid Waste Recycling) o (Operational) All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

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	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.). o Reuse of existing structure and shell in renovation projects. o Design for deconstruction without compromising safety. o Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components. o Development of indoor recycling program and space. o 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. o Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required. o Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. o Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. o 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. o Develop alternative waste management	o (Operational) Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. o (Construction/Demolition) Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes. o (Construction/Demolition) To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

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	strategies such as composting, recycling, and conversion technologies. o Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. o Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). o Integrate reuse and recycling into residential industrial, institutional and commercial projects. o Provide recycling opportunities for residents, the public, and tenant businesses. o Provide education and publicity about reducing waste and available recycling services. o Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates. o 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.	

Source: Southern California Association of Governments, Final 2016 2016-2040 RTP/SCS Program Environmental Impact Report, Mitigation Monitoring and Reporting Program, April 2016.

5.0 Performance Standards

5.1 Residential

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

5.2 Energy and Water Efficiency

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

5.3 Cultural Resources

- Performance Standard CR-1 (Cultural Resources):
    - Prior to the commencement of ground disturbing activities, a Cultural Resources Monitoring Plan (Monitoring Plan) shall be prepared. The Monitoring Plan shall include, but not be limited to, monitoring protocol for ground-disturbing activities; a construction worker training program; and discovery and processing protocol for inadvertent discoveries of cultural resources or Tribal Cultural Resources. The plan shall identify the areas of sensitivity determined for cultural resources and Tribal Cultural Resources that require monitoring and detail a protocol for determining circumstances in which additional, or reduced levels of monitoring (e.g., spot checking) may be appropriate. Specifically, the Monitoring Plan shall include a framework for assessing the geoarchaeological setting to determine whether undisturbed sediments (i.e., 'native' sediments) capable of preserving archaeological remains are present adjacent to or beneath those sediments disturbed by urban development, and the depth at which these sediments would no longer be capable of containing archaeological material and thereby cease to require an archaeological monitoring to be present. Because of the overall sensitivity for archaeological resources affiliated with Native American occupation, the Monitoring Plan shall consider the extent of existing disturbances and determine the presence of cultural resources within those or surrounding native sediments. The plan shall identify the process for contacting tribal groups in the event of inadvertent discovery of archaeological resources, Tribal Cultural Resources, or human remains.

- Performance Standard CR-2 (Archaeological Resources):
    - In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

5.4 Hazards and Hazardous Materials

- Performance Standard HAZ-1 (Dewatering and Groundwater Management Plan):
    - A Dewatering and Groundwater Management Plan (DGMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated groundwater can be properly handled, treated, and disposed of at a licensed disposal facility. Proper handling of the contaminated groundwater would be required regardless of the contamination source.

- In the unlikely event that contaminated groundwater is discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.

- Performance Standard HAZ-2 (Asbestos-Containing Materials and Lead-Based Paint):
  - Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529).
  - Disturbance of any LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and the US Department of Housing and Urban Development (HUD) and 2010 Toxic Substances Control Act (TSCA) Renovation, Repair and Painting Rule (RRP) in pre-1978 target housing and child-occupied facilities. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead.

- Performance Standard HAZ-3 (Methane Report):
  - Due to the potential environmental risk associated with construction in Methane Buffer Zones, a Methane Assessment Report shall be conducted prior to the redevelopment of the Project Site.

5.5 Noise

Increased Noise Levels (Demolition, Grading, and Construction Activities):

- Performance Standard N-1: Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Performance Standard N-2: To the maximum extent possible, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- Performance Standard N-3: The project contractor shall use power construction equipment with noise shielding and muffling devices.
- Performance Standard N-4: The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 10-dBA reduction in sound level.
- Performance Standard N-5: During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent residential land uses does not exceed 5 dBA over the ambient noise levels.
- Performance Standard N-6: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

5.6 Public Services

- Performance Standard PS-1 Public Services (Police – Demolition/Construction Sites):
    - Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

- Performance Standard PS-2 Public Services (Police):
    - The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

5.7 Transportation and Traffic

- Performance Standard TR-1 (Construction Management Plan):
    - A Construction work site traffic control plan shall be submitted to DOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.
    - All delivery truck loading and unloading shall take place on site.
    - The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
    - Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
    - Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
    - The Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.