

Appendix H

Inventory of CRA Mitigation Measures

Prepared by the Department of City Planning

Impact Area	Community Redevelopment Plan Area	Mitigation Measures	Response to Mitigation Measure	Impact of Removing Mitigation Measure			
Land Use & Planning	Central Industrial	1 LU1	The Agency's approval of developments within commercial or industrial corridors shall explicitly consider the effects of commercial activities on adjacent residential properties. Site plan and project design reviews shall be conducted to ensure that projects in these areas will be appropriately screened to mitigate light, glare, and noise impacts. As a condition of project approval, mitigation measures to avoid light, glare, and noise impacts shall be established, which would include, but are not limited to, screening of physical design.	Not necessary and infeasible. The mitigation is inconsistent with current City policy, as well as the policies and programs proposed under the Downtown Plan. The mitigation measure is derived from an older zoning system, and does not comport with the various new and more detailed Use Districts and Development Standards that are proposed as part of the Project, that better manage the compatibility between residential and commercial uses, and that are proposed to be applied to by-right projects. Further, the mitigation measure is inconsistent with the City, and the Downtown Plan's, goal to reduce Vehicle Miles Traveled by facilitating a more robust mix of uses within proximity to transit resources located throughout the Community Plan Area. Lastly, the City can continue to identify and mitigate project-specific light, glare, and noise effects consistent with project review (same as the current Site Plan Review) and other similar discretionary approval processes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.10 (Land Use) - less than significant impact related to inconsistency with land use plans and policies; Section 4.1 (Aesthetics), less than significant impacts on light, glare and shade; Section 4.11 (Noise) - less than significant impact to permanent noise increases due to stationary and mobile operational activities; significant and unavoidable impacts generated by temporary construction noise.		
		2 LU2	Proposed industrial uses shall be buffered from adjacent residential neighborhoods through a variety of land use planning and site design techniques which would include, but are not limited to, the following: screening walls, landscaped setbacks, perimeter or intervening streets, etc.	Not necessary. The mitigation is inconsistent with the policies and programs proposed under the Downtown Plan. The Plan confines traditional industrial uses that have historically necessitated buffering to a smaller geography than applied under the Redevelopment Plan. The Downtown Plan also proposes more contemporary Development Standards for both more traditional industrial uses, as well as newer industrial (hybrid industrial, production uses, etc.) that address buffering between residential and industrial uses.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.10 (Land Use) - less than significant impact related to inconsistency with existing land use plans and policies.		
		3 LU3	Proximity and nuisance impacts such as light, glare, odor, and noise shall be minimized through project design features.	Lighting and Glare. Infeasible. This mitigation measure requires a project-specific lighting plan for projects adjacent to existing residences or other sensitive uses. Projects of a certain size that could potentially cause lighting spillover impacts are subject to LAMC Section 16.05 (Site Plan Review) which would allow for site-specific analysis of potential light and glare effects as appropriate under State law. Future development in the the Downtown Plan would be required to comply with LAMC Chapter 9, Article 3, Section 93.0117 and Chapter 9, Article 1, Section 91.6205M, for light and glare affecting residential uses. These standards prohibit the use of highly reflective or deeply tinted glass. In addition, new standards contained in the New Zoning Code would further reduce glare potential by preventing new development from using materials that typically create high levels of glare. Existing applicable regulatory frameworks include LAMC Signs Article 4.4 Sign Regulations; 14.4.3 Application; 14.4.4 General Provisions; 14.4.5 Hazard to Traffic; 14.4.6 Freeway Exposure. As a matter of policy the City finds adopting and implementing additional processes and design standards and imposing additional study and review requirements, including to address lighting and glare, and other than those already existing, such as project review (same as the current Site Plan Review), and those proposed with the Downtown Plan are unnecessary and undesirable, and would not result in an efficient use of City resources or desirable land use outcomes. Additionally, per SB 743—a bill that is intended to reduce GHG through encouragement of development around transit—aesthetic impacts are not considered CEQA impacts for infill projects within a transit priority area (TPA). Most of the Downtown Plan area is in a TPA. These aesthetic impacts include impacts to visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas. Infill projects are residential, mixed-use residential, or employment center project, consistent with the development that is anticipated under the Downtown Plan.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.1 (Aesthetics)- less than significant impacts on light, glare and shade; Section 4.11 (Noise)- less than significant impact to permanent noise increases due to stationary and mobile operational activities; significant and unavoidable impacts generated by temporary construction noise.		
			Odor. Not necessary. The Downtown Plan concentrates heavy and, light industrial uses in the eastern and southern portions of the Downtown Plan Area, away from residential uses. In addition, the Downtown Plan includes standards for new buildings that would insulate against odor issues.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, Section 4.3 (Air Quality) - less than significant impacts related to odor.			
		Noise. Not necessary. The California Building Code Title 24 has noise insulation standards for new buildings, and the City has a noise ordinance to regulate excessive noise, including around residential areas. Additionally, discretionary projects can be reviewed for noise under environmental review project review, if applicable. As a policy matter, the City finds adopting any additional regulations, requirements or review to address noise, including for ministerial and discretionary projects, is not desirable or necessary and would not be an efficient use of City resources or result in good land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, Section 4.11 (Noise)- less than significant impacts to permanent noise increases due to stationary and mobile operational activities; significant and unavoidable impacts generated by temporary construction noise.				
		LU4	The Agency's review and approval of residential projects shall consider the predominately industrial nature of the area. Site plan and project design reviews shall be conducted to ensure that projects in these areas will incorporate design features (screening, double or triple glazing, etc.) to minimize adverse impacts resulting from the presence of residential uses in an industrial area.	Infeasible. The Downtown Plan establishes Hybrid Industrial Zones, which directly address compatibility between residential, live/work, and non-residential uses, through use limitations, as well as Development Standards. This mitigation measure is inconsistent with a ministerial review process and adds an additional layer of review to discretionary approvals that is undesirable. project review (same as the current Site Plan Review) in the LAMC requires that projects of a certain size would be subject to design review conditions of approval by way of a Director's determination and environmental clearance. As a matter of policy the City finds adopting and implementing additional processes and design standards for discretionary and ministerial projects, other than those already existing, including project review (same as the current Site Plan Review), and those proposed in the Downtown Plan are unnecessary and undesirable, and would not result in an efficient use of City resources or desirable land use outcomes. Additionally, impacts to new residential occupants from existing uses is not a CEQA impact.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.10 (Land Use) - less than significant impact related to inconsistency with current land use plans and policy.		
		4 LU5	During project-specific development and design, the Agency shall coordinate with the City of Los Angeles Department of Planning regarding planning goals and objectives.	Not necessary and infeasible. The Agency no longer implements the Redevelopment Plans, the Redevelopment plans are now implemented directly by City of Los Angeles Department of City Planning, thus the mitigation requiring inter-agency coordination is functionally irrelevant. Furthermore, the proposed Downtown Plan is an update to the existing Central City and Central City North Community Plans. The goals, policies, zoning and implementation of the Downtown Plan are aligned to reflect and further the larger goals and objectives of the City of Los Angeles Department of City Planning, including the goal to reduce greenhouse gas emissions, direct growth to transit hubs, and to plan for increases to the housing supply. Therefore, the City finds adopting any additional regulations, requirements or review to address the departments planning goals and objectives, is not necessary.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Chapter 3 (Project Description) for a discussion of the goals and objectives of the Downtown Plan.		
	City Center	1 LU1 LU2 LU3 LU4	See Central Industrial LU1 above See Central Industrial LU2 above See Central Industrial LU3 above See Central Industrial LU4 above	See response to Central Industrial LU1 above. See response to Central Industrial LU2 above. See response to Central Industrial LU3 above. See response to Central Industrial LU4 above.			
	Chinatown	1 A1	N/A	N/A			
Aesthetic	Central Industrial	1 A1	For all new development greater than 30 feet in height considered within and/or adjacent to areas of existing concentrations of artist loft housing, a specific determination shall be made as to whether sunlight access would be substantially impaired. In those instances where adverse impacts are anticipated, changes in building orientation, setback or massing shall be required to reduce or eliminate the impact.	Infeasible. This mitigation measure is inconsistent with State and Local policy, per SB 743—a bill that is intended to reduce GHG through encouragement of development around transit—aesthetic impacts are not considered CEQA impacts for infill projects within a transit priority area (TPA). Most of the Downtown Plan area is in a TPA. These aesthetic impacts include impacts to visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas. Infill projects are residential, mixed-use residential, or employment center projects, consistent with anticipated development under the Downtown Plan. The City regulates height and massing through zoning standards and its decisions to designate properties with contextual and tailored development standards compatible with existing visual character. Moreover, this mitigation measure requires project-specific studies. Per LAMC, project review (same as the current Site Plan Review) requires that projects of a certain size would be subject to design review conditions of approval by way of a Director's determination and environmental clearance. As a matter of policy the City finds adopting and implementing additional processes and design standards and imposing additional study and review requirements, including to address shade and shadow, other than those already existing, including Site Plan Review, and those proposed with the Downtown Plan are unnecessary and undesirable, and would not result in an efficient use of City resources or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.10 (Land Use) of the DEIR for the less than significant land use impacts; Section 4.11 (Aesthetics)- for less than significant impacts on light and shade.		
		2 A2	Lighting plans for public and private projects located adjacent to existing residences (apartments, condominiums, etc.) shall be reviewed by the Agency to determine that there will be no adverse spillover lighting effects. Where lighting is adjacent to existing residential units, cutoffs, shrouds, shields or similar techniques shall be used to eliminate potential impacts.	Infeasible. This mitigation measure is inconsistent with State and Local policy, per SB 743—a bill that is intended to reduce GHG through encouragement of development around transit—aesthetic impacts are not considered CEQA impacts for infill projects within a transit priority area (TPA). Most of the Downtown Plan area is in a TPA. These aesthetic impacts include impacts to visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas. Infill projects are residential, mixed-use residential, or employment center projects, consistent with anticipated development under the Downtown Plan. Furthermore, this mitigation measure requires a project-specific lighting plan for projects adjacent to existing residences or other sensitive uses. Projects of a certain size that could potentially cause lighting spillover impacts would likely be subject to project review (same as the current Site Plan Review) including design review conditions of approval by way of a Director's determination and environmental clearance. As a matter of policy the City finds adopting and implementing additional processes and design standards and imposing additional study and review requirements, including to address lighting issues, other than those proposed with the Downtown Plan and those already existing, including Site Plan Review, are unnecessary and undesirable, and would not result in an efficient use of City resources or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.1 (Aesthetics)- for less than significant impacts related to lighting and glare.		
			City Center	1 A1	To ensure that new development is visually compatible in scale and character with adjacent existing development, the Agency shall adopt design guidelines for residential areas and commercial corridors within the Project Area. These guidelines shall supplement existing zoning requirements and provide additional guidance regarding landscaping, open space, height, setbacks and similar factors that influence visual compatibility of land uses.	Infeasible. New development would be subject to neighborhood-specific Form, Frontage, and Development Standard provisions, under the proposed new zoning system, and thus the more subjective design guidelines envisioned by the mitigation measure are unnecessary (and furthermore the adoption of Design Guidelines is not permissible under SB330). Form Standards regulate lot size, lot coverage, outdoor amenity space, floor area ratio and building height, and upper-story bulk and building mass. Frontage Standards regulate facade treatment requirements, design and spacing of building entrances, front yard landscaping, blank wall width, and ground story height. Development Standards regulate facade treatment requirements, design and spacing of building entrances, front yard landscaping, blank wall width, and ground story height. Development Standards regulate facade treatment requirements, design and spacing of building entrances, front yard landscaping, blank wall width, and ground story height. As a matter of policy, the City finds adopting and implementing additional processes and design standards for visual compatibility, other than those already existing, and those proposed in the Downtown Plan are unnecessary and undesirable, and would not result in an efficient use of City resources or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.10 (Land Use) - no, or less than significant, land use impacts; Section 4.01 (Aesthetics)- less than significant impacts on visual compatibility.
			Chinatown	2 A2	See Central Industrial A2 above N/A	See response to Central Industrial A2 above. N/A	
Cultural & Historical Resources	Central Industrial	1 CR1	To the extent feasible, existing architectural and historic resources shall not be demolished and shall be incorporated into future development.	Infeasible. The City's Cultural Heritage Ordinance requires that all projects that include a designated Historic Cultural Monument, are required to be reviewed by Office of Cultural Heritage. Controversial, discretionary project, including those that require project review (same as the current Site Plan Review) are required to undergo CEQA review to determine if they will impact a historic resource and to mitigate significant impacts. The City will need to prepare an Environmental Impact Report and adopt a statement of overriding considerations before causing a significant impact. The City finds as a matter of policy, including any additional processes, including additional delay to additional properties, to the review and approval of projects for the purposes of historical resource protections, than those in the Downtown Plan or in existing City regulations, including those for Historical Cultural Monuments, HPOZs, and the Building and Safety code requirements, is unnecessary and undesirable and would not result in an efficient use of City resources or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.4 (Cultural Resources) of the DEIR for potentially significant and unavoidable impacts related to historical resources.		
		2 CR2	Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation.	Not Necessary. The City's Cultural Heritage Ordinance requires all projects that include a designated Historic Cultural Monument or discretionary projects that include eligible historical resources be subject to Office of Historic Resources review. Historic Cultural Monuments require Cultural Heritage Commission review for proposed exterior and interior alterations in accordance with the Secretary of the Interior's Standards for Rehabilitation. As a matter of policy, the City finds including any additional processes, including additional delay to properties, or the review and approval of projects for the purposes of historical resource protections, other than those already existing, including processes for Historical Cultural Monuments, HPOZs, and the Building and Safety code requirements, and those proposed in the Downtown Plan are unnecessary and undesirable, and would not result in an efficient use of City resources or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.4 (Cultural Resources) of the DEIR for the potentially significant and unavoidable impacts related to historical resources.		

		3	CR3	New developments adjacent to significant historic or architectural resources shall be compatible in size, scale, materials, fenestration and massing to such historic or architectural resources.	Infeasible. The Downtown Plan proposes zoning standards that include height limitations and contextual infill facade standards in certain historic districts within the Plan area. As a matter of policy, the City finds adopting further design standards, other than those already existing are unnecessary and undesirable (and furthermore the adoption of Design Guidelines is not permissible under SBSS3) and would not result in an efficient use of City resources or result in desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.4 (Cultural Resources) of the DEIR for the potentially significant and unavoidable impacts related to historical resources.
		4	CR4	Historic street lamps shall be repaired and reused rather than replaced by contemporary fixtures for streetscape improvements.	Infeasible. This mitigation addresses an individual project-level concern. Any discretionary project, such as City streetwork improvements or larger private development projects that would be required to do streetwork improvements that could impact eligible historic resources, including street improvements, such as street lamps, would require CEQA review and mitigation measures to avoid impacts to historical resources as defined by CEQA. Any additional policy intervention to protect "historic" street lamps in ministerial projects including the adoption of design standards is not desirable. Moreover, the measure is not needed to avoid impacts to aesthetics because the City does not find as a policy matter that the loss of such street lights will result in a significant aesthetic impact. Additionally, most of the Plan Area would be in a Transit Priority Area which would not have an aesthetic impact for reasonably foreseeable development.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.4 (Aesthetics) for less than significant impacts to visual character and light and glare; Section 4.4 (Cultural Resources) of the DEIR for potentially significant and unavoidable impacts related to historical resources.
		5	CR5	If human remains are exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. Construction must halt in the area of the discovery of human remains, the area must be protected, and consultation and treatment should occur as prescribed by law.	Not Necessary. Protocol for the discovery of human remains is already part of the regulatory framework. See California Health and Safety Code Section 7050.5(b)	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.4 (Cultural Resources) and Section 4.16 (Tribal Resources) of the DEIR- for less than significant impacts with mitigation related to discovery of human remains during construction.
		6	CR6	To locate cultural resources, archaeological monitoring is recommended for initial ground disturbance, unless other treatment methods have indicated that monitoring is not required. If cultural materials are exposed during construction, construction shall be diverted from that area. The area of discovery should be protected from disturbance while qualified archaeologists and appropriate officials, in consultation with the State Historic Preservation Office (SHPO), determine an appropriate treatment plan.	Not Necessary. The Downtown Plan DEIR addresses impacts for projects on archaeological resources in Section 4.4, Cultural Resources through mitigation measures 4.4-2(a) through 4.4-2(d), which are equal or more effective than this mitigation measure.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.4 (Cultural Resources) of the DEIR - for less than significant impacts with mitigation related to archaeological resources; Section 4.16 (Tribal Resources)-for less than significant impacts with mitigation related to discovery of tribal cultural resources.
	City Center	1	CR1	See Central Industrial CR1 above	See response to Central Industrial CR1 above.	
		2	CR2	See Central Industrial CR2 above	See response to Central Industrial CR2 above.	
		3	CR3	See Central Industrial CR3 above	See response to Central Industrial CR3 above.	
		4	CR4	See Central Industrial CR4 above	See response to Central Industrial CR4 above.	
		5	CR5	To locate prehistoric cultural resources, archaeological monitoring is recommended for initial ground disturbance, unless other treatment methods have indicated that monitoring is not required. If cultural materials are exposed during construction, construction should be diverted from that area. The area of the discovery should be protected from disturbance while qualified archaeologists and appropriate officials, in consultation with the State Historic Preservation Office (SHPO), determine an appropriate treatment plan. If human remains re exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. Construction must halt in the area of discovery of human remains, the area must be protected, and treatment should occur as prescribed by law.	Not Necessary. The DEIR Section 4.4 Cultural Resources addresses impacts for projects on cultural resources, through 4.4-2(a) through 4.4-2(d), which are equal or more effective than this mitigation measure. Protocol for the discovery of human remains is already part of the regulatory framework. See California Health and Safety Code Section 7050.5(b).	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.4 (Cultural Resources) of the DEIR- for less than significant impacts with mitigation related to archaeological resources and less than significant impacts related to human remains; Section 4.16 (Tribal Resources) for less than significant impacts with mitigation related to discovery of tribal cultural resources.
		6	CR6	See Central Industrial CR6 above	See response to Central Industrial CR6 above.	
	Chinatown			NA	NA	
Population, Housing & Employment	Central Industrial	1	PHE1	For private projects within the proposed Project Area, relocation assistance shall be provided to displaced low to moderate income households to the fullest extent provided by law. For public projects, relocation assistance shall be provided to residents in accordance with applicable federal and state requirements.	Infeasible and Unnecessary. The impact being addressed by this mitigation measure is a social economic impact and not a CEQA impact. As shown in Section 4.12 of the Draft EIR, there is no substantial evidence to support significant environmental impacts related to housing displacement. However, as a matter of policy, the City has established multiple programs to support housing opportunities for a range of incomes: Just Cause Eviction Ordinance - Just cause eviction statutes are laws that stipulate specific reasons and conditions for which tenants can legally be evicted for. These are called "just causes" which can include failure to pay rent or violations of lease term. City of Los Angeles' Rent Stabilization Ordinance (RSO) - Rent stabilization control ordinances protect tenants from excessive rent increases, while allowing landlords a reasonable return on their investments. These ordinances limit rent increases to certain percentages, but California state law allows landlords to raise rents to the market rate once the unit becomes vacant. City of Los Angeles' Condominium Conversion Regulation - The converting of rental units to condominiums impacts the City's vital rental housing supply and has removed vital housing stock from the rental market. Tenant relocation assistance regulations prohibit landlords from removing tenants from units until they are adequately relocated. Regulations also prohibit conversions unless the city or regional vacancy rate is five percent or less. This regulation is to preserve the supply of housing and protect tenants affected by conversions. SB 330 - Establishes the Housing Crisis Act of 2019, which accelerates housing production in California by streamlining the permitting and approval processes. It also provides protections for occupants by requiring that existing units be replaced by equivalent new units and occupants can live in the existing units up to six months prior to demolition. Occupants also must receive relocation assistance, have first right-of-return, and can move back in at an affordable rate. AB 2222 - Expands affordability covenants from 30 to 55 years of all very low and low-income units that qualified an applicant for a density bonus. Requires that developers identify and replace one for one, all of the property's pre-existing affordable units to be eligible for a density bonus. The Downtown Community Benefits Program (CBP) - This program provides incentives that prioritize mixed-income and 100 percent affordable housing and seeks to ensure replacement of affordable units on project sites. Incentives offer greater height, and floor area ratio, particularly around fixed rail transit stations and bus corridors. Additionally, the CBP provides opportunities for small business support through the provision of onsite community facilities.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.12 (Population and Housing)-less than significant impacts related to unplanned growth and net loss or displacement of housing.
		1	PHE2	Any affordable housing units for all income levels displaced in the proposed Project Area shall be replaced on a one-for-one basis at a minimum.	Infeasible and Unnecessary. As shown in the Draft EIR in Section 4.12, the Proposed Plan is not expected to result in significant environmental impacts from reasonably anticipated development as a result of a loss of housing. This measure addresses socio-economic impacts without evidence of it resulting indirectly in a significant impact to the physical environment. As such, it is not a CEQA impact. Moreover, as a policy matter, providing replacement housing is infeasible. Per the City's Rent Stabilization Ordinance, removal of rent-controlled units under the state's Ellis Act must either have a one-for-one replacement with affordable units or ensure that 20% of new units are affordable - whichever number is higher. The City also recently adopted a linkage fee and implemented the Transit Oriented Communities (TOC) Guidelines as additional means of providing affordable housing in the City. As a matter of policy the City finds using City funds to provide replacement housing that can no longer be funded by CRA tax increment is undesirable and will not result in the best use of City funds or the most efficient use of resources to provide affordable housing	
		2	PHE 3	The Redevelopment Plan shall contain provisions to provide relocation assistance to displaced businesses or non-profit organizations such as community and social service providers (in the unlikely event that the latter is displaced) at comparable locations, as well as to retain businesses and jobs within the proposed Project Area or non-profit organizations within their service area.	Infeasible. The impact being addressed by this mitigation measure is a social economic impact and not a CEQA impact. There is no substantial evidence to support significant environmental impacts related to commercial displacement. This mitigation measure relates to relocation assistance and is only applicable to the Redevelopment Agencies. The city has established programs to support small businesses. The Downtown Community Benefits Program (CBP) - This program provides incentives that offer greater height, and floor area ratio, particularly around fixed rail transit stations and bus corridors in exchange for community facilities such as social services, business incubators, and public facilities. As a matter of policy the City finds using City funds to provide relocation assistance to business property owners and tenants is not the best use of City funds or a desirable public policy.	
	City Center	3	PHE 4	The Agency shall phase and permit development in the proposed Project Area in a manner that will ensure that, when existing	See response to Central Industrial PHE 3 above.	
		1	PHE1	See Central Industrial PHE 1 above	See response to Central Industrial PHE 1 above.	
		2	PHE2	See Central Industrial PHE 2 above	See response to Central Industrial PHE 2 above.	
		3	PHE3	The Redevelopment Plan shall contain explicit provisions to provide relocation assistance to displaced businesses at comparable	See response to Central Industrial PHE 3 above.	
		4	PHE4	See Central Industrial PHE 4 above	See response to Central Industrial PHE 4 above.	
	Chinatown	1	I.X.6.	Some of the expected inconveniences and expenses of relocation due to Agency activities will be mitigated. The Redevelopment Plan and California Community Redevelopment Law requires the Agency to assist in finding relocation facilities and to make relocation payments. Any large scale displacement of individuals, families and businesses at any one time will be avoided. No residents will be displaced unless and until there is suitable housing available and ready for occupancy at rents comparable to those paid at the time of displacement	See responses to Central Industrial PHE2 and PHE3 above. Additionally, the tax increment funding source used by the Redevelopment Agencies to provide this mitigation is not available to the City and was no longer available to the CRA/LA after the Dissolution Law dissolved the former CRA.	
Transportation & Traffic	Central Industrial	1	T1	The "Los Angeles Downtown Strategic Plan" contains transportation strategies intended to provide system wide mitigation of vehicular traffic in the downtown area. The key elements of this strategy are to: • continue the development and implementation of the regional rail system components serving downtown; • continue the development and implementation of transit way and high-occupancy-vehicle (HOV) facilities to both serve downtown and provide a regional HOV network; • expand convenient, accessible and coordinated transit service with the downtown area, to encourage use of transit for commute trips and to enhance internal circulation within the Central Business District (CBD); • add buses as necessary on overcrowded lines.	Infeasible. Since the adoption of this CRA plan, the City's policies related to mobility and circulation have substantially changed with the adoption of Mobility Plan 2035 in 2015, SB 743, and the Complete Streets Act and the movement away from vehicular travel towards a multi-modal travel. Since the adoption of the CRA plan, the Downtown Plan area has seen significant transportation investments and has many rail improvements underway such as the LinkUS project, Metro L(Gold) line expansion, and the Metro Regional Connector project. The improvements will transform LA Union Station into a world-class transit and mobility hub, create three additional transit stations within the Plan Area and expand multimodal connection for Angelenos across the City and County of Los Angeles. The City is also currently working on a Mobility Investment Plan (MIP) to identify and prioritize capital improvement projects that support a multimodal environment. As a policy matter, the City finds adopting any additional programs or requirements to encourage multimodal uses other than those improvements underway and proposed in the MIP, those proposed in the Mobility 2035 plan, the Downtown Plan and the MIP, is unnecessary and undesirable, would not be a good use of limited City resources, and would not result in good public policy related to addressing transportation issues in the City	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.12 (Transportation) for less than significant impacts related to off-ramp queuing.
		2	T2	Santa Fe.3rd to 4th - Restripe to create two lanes northbound, which will, increase capacity by one lane northbound.	Infeasible. The Downtown Plan envisions mobility improvements consistent with contemporary City policy, such as Mobility Plan 2035. This segment of Santa Fe is included in an active transportation improvement grant area. The ATP Grant promotes expanded bike facilities, consistent with policy direction found in the Project and Mobility Plan 2035. As a policy matter, the City finds that making the additional changes called for in this mitigation measure, including adding additional lanes at intersections, is inconsistent, and not a desirable street configuration and would not be a good use of limited City resources for street improvements or interventions.	
		3		Seventh: Alameda to Mill - Imposition of no parking/no stopping provisions on both sides of the street during both AM and PM Peak traffic hours, which will increase capacity by three lanes in each direction.	Infeasible. The Downtown Plan envisions mobility improvements consistent with contemporary City policy, such as Mobility Plan 2035. The segment of 7th street from Alameda to Hill is included in the 6th Street Viaduct infrastructure improvement plan, superseding the plans proposed in the mitigation measure. As a policy matter, the City finds that increasing capacity by three lanes on this right of way, is inconsistent with contemporary policy direction, would not be a good use of limited City resources for street improvements or interventions, and is not a desirable street configuration.	

		4	Olympic: Alameda to Lawrence - Imposition of no parking/no stopping provisions on both sides of the street during both AM and PM peak traffic hours, which will increase capacity by three lanes in each direction.	Infeasible. The Downtown Plan envisions mobility improvements consistent with contemporary City policy, such as Mobility Plan 2035. This segment of Olympic has been improved based on more recent policy direction. The west bound segment of Olympic currently has three lanes, and a fourth lane to accommodate and a bus zone on the corner turning onto Northbound Alameda. The eastbound segment of Olympic between Alameda and Lawrence currently has two lanes, with red curb sections, and ingress for driveways for local businesses along the segment. Additionally, as a policy matter, the City finds that increasing capacity by three lanes on this right of way, would not be a good use of limited City resources for street improvements or interventions, and is not a desirable street configuration.	
	City Center	1 T1	See Central Industrial T1 above	See response to Central Industrial T1 above	
		2 T2	Third Street between San Pedro Street and Central Avenue - install peak hour no parking/no stopping restrictions and stripe a fifth westbound lane on the north side of the street during AM peak hours.	Infeasible. The Downtown Plan envisions mobility improvements consistent with contemporary City policy, such as Mobility Plan 2035. Street widening are not consistent with the city's Mobility Plan 2035 or contemporary policy direction to reduce VMT. As a matter of policy, the City finds that making the additional changes necessary to install restraining parking and implementing no stopping provisions, is unnecessary and undesirable, would not be a good use of limited City resources for street improvements or interventions, and would not result in desirable parking services, street configuration or street operations.	
		3	Eleventh Street between Santee Street and Los Angeles Street - install peak hour no parking/no stopping restrictions and stripe a second lane on the south side of the street.	Infeasible. The Downtown Plan includes policies supporting TDM strategies, which could include carpool and vanpool incentives, for new non-residential projects. The Infeasible. Since the adoption of the CRA plan, the People Mover project evolved into the Regional Connector project, currently under construction. The Downtown Infeasible. This mitigation measure is no longer consistent with contemporary City policy. The Downtown Plan follows contemporary City policy direction, and has eliminated parking minimums to encourage non-vehicular travel, increase affordability, and improve design outcomes in the Plan Area.	
	Chinatown	1 IX.2.a	Traffic impacts would be reduced by encouragement of employers to form car and van pools and to provide preferred parking.	Infeasible. The Downtown Plan includes policies supporting TDM strategies, which could include carpool and vanpool incentives, for new non-residential projects. The Infeasible. Since the adoption of the CRA plan, the People Mover project evolved into the Regional Connector project, currently under construction. The Downtown Infeasible. This mitigation measure is no longer consistent with contemporary City policy. The Downtown Plan follows contemporary City policy direction, and has eliminated parking minimums to encourage non-vehicular travel, increase affordability, and improve design outcomes in the Plan Area.	
		2 IX.2.b.	Traffic impacts would be reduced by encouragement of the use of buses and any future mass transit modes, including the People		
		3 IX.2.c.	Traffic impacts would be reduced by encouragement of utilizing the opportunities afforded by the City's Parking Management Plan.		
		4 IX.2.d.	Traffic impacts would be reduced by the potential implementation of traffic flow improvements, including traffic management parking controls, street widening, creation of cut de sacs and resolving of intersection problems such actions would mitigate present congestion, visual, noise and air pollution concentrations, and those which may occur due to Project activities.	Infeasible. As written, the action set forth in this mitigation measure is unclear and therefore infeasible.	
		5 IX.2.e.	Traffic impacts would be reduced by the strengthening through Redevelopment activities of Chinatown's role as an employment and residential center, thereby resulting fewer work trips. The new developments are also consistent with the State's urban development strategy of developing inner-city areas to reduce travel requirements.	See response to IX.2.d. above.	
Air Quality	Central Industrial	1 AQ1	The Agency shall ensure that the best practices are employed to reduce the creation of inhalable dust particles during the construction process for Agency-sponsored or funded projects. Abatement shall use measures consistent with SCAQMD Rule 403, such as: - Watering and sweeping construction areas and their vicinities (within a 500-foot radius) such that a 12 percent surface soil moisture content throughout any site grading or excavation activity is maintained;	Not necessary. Rule 403 (fugitive dust) is already part of the regulatory framework.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.2 (Air Quality) of the DEIR for less than significant impacts to conflicting or obstructing implementation of applicable Air Quality plans.
		2 AQ2	Construction sites shall implement control measures that at a minimum satisfy the requirements of SCAQMD Rule 403.	See response to AQ1 above.	
		3 AQ3	The Agency shall require a Phase I assessment for the demolition of existing buildings and/or the excavation/grading of existing industrial sites. These assessments shall specifically specify the potential for airborne contaminants; recommended abatement measures to be implemented.	Not necessary. The DT EIR addresses potential ACM and LBP exposure during renovation or demolition of discretionary projects in Section 4.2 Air Quality and hazardous contamination in Section 4.8 Hazards. As a policy matter, the City finds adopting additional processes, review and requirements to address hazardous materials for the approval of development projects or construction is unnecessary and undesirable and would not result in good public policy or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, see Section 4.8 (Hazards & Hazardous Materials) - less than significant level with mitigation; Section 4.2 (Air Quality) significant and unavoidable impact related to emissions during construction.
		4 AQ4	Construction sites that would result in particulate emissions greater than the SCAQMD 150 lbs. Per day shall be specifically reviewed to determine whether there are residences, SRO's transitional housing, health service providers, or major sidewalk homeless encampments within 500 feet of the site. If any of these conditions are met, additional abatement will be achieved through a combination of temporary screens installation or retrofit of air conditioners or the temporary relocation of sidewalk homeless encampments.	Infeasible. Given the scope of the Downtown Plan, the City finds the project level locational aspects of this mitigation measure infeasible to enforce at the Community Plan Level. Larger projects that would foreseeably result in these emissions would be required to do environmental assessments and would be required to mitigate any significant air impacts to sensitive receptors.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.2 (Air Quality) - less than significant impacts to conflicting or obstructing implementation of applicable Air Quality plans; less than significant impacts related to operational pollutants and odor generation, and significant and unavoidable impact related to emissions during construction; and significant and unavoidable impacts related to operational emissions of toxic air contaminants associated with distribution centers.
		5 AQ5	All proposed new industrial uses shall be queried as to whether an SCAQMD permit is required for any equipment or process. If any permanent residential use is located within 500 feet, then the Agency shall require a health risk assessment with additional abatement measures should unacceptable levels of risk (as defined by the US EPA and the California EPS and California Department of Toxic Substances) be identified.	Not necessary. This mitigation measure is already part of the regulatory framework, see DEIR Section 4.2 Air Quality.	
		6 AQ6	The Agency shall require the preparation of an assessment of diesel related inhalable contaminants for any new or significantly expanded truck terminal within the proposed development project that is located within 500 feet of a permanent residential use. The Agency shall require a health risk assessment with additional abatement measures should unacceptable levels of risk (as defined by the US EPA and the California EPS and California Department of Toxic Substances) be identified.	Not necessary. The DEIR addresses diesel emissions and CARB regulation for any approval of a project located in the Downtown Plan Area in Section 4.2 Air Quality. In addition, per mitigation measure in the DEIR, 4.2 Air Quality, distribution centers in the Downtown Plan Area within 1,000 feet of sensitive land uses that require discretionary permits and would accommodate more than 100 truck trips or 40 transport refrigeration units (TRUs) per day are required to prepare health risk assessments (HRAs) per SCAQMD and OEHHA guidance to identify the potential for cancer and non-cancer health risks. If cancer risks exceeding SCAQMD standards are identified, the applicant shall identify ways to reduce risks. 4.2 Air Quality, CONCERNED WE DONT DISCUSS	
		7 AQ7	ROG reductions during architectural coating. All Agency-sponsored projects that require the use of architectural coatings shall use coating transfers or spray equipment with a transfer efficiency rate of no less than 65 percent.	Not necessary. The DEIR addresses the requirement to utilize architectural coatings compliant with the current SCAQMD standards in Section 4.2 Air Quality which satisfies this requirement.	
		8 AQ8	The Agency shall coordinate with the Los Angeles Department of Transportation to ensure that designated truck routes are not located adjacent to existing or planned residential areas.	Not necessary. Section 4.2 Air Quality of the DEIR includes a mitigation measure that requires discretionary projects that involve construction-related activity to comply with best management practices, including re-routing construction trucks away from sensitive receptor areas to address any possible air and noise impacts.	
		9 AQ9	Within 500 feet of a proposed residential unit the Agency shall require an analysis, which evaluates the potential for the proposed industrial use to result in objectionable odors.	Not necessary. The Downtown Plan concentrates production, light industrial, and heavy industrial uses in the eastern and southern portions of the Downtown Plan Area, away from residential uses. The Downtown Plan includes standards for new buildings that would insulate against odor issues.	
	City Center	10 AQ10	Reduction in Mobile Emissions of Carbon Monoxide, Nitrogen Dioxide and Reactive Organic Gas (Ozone precursor). To reduce	Infeasible. This applies to CRA funded and sponsored projects.	
		1 AQ11	PM10 Abatement. The Agency shall ensure that best practices are employed to reduce the creation of inhalable dust particles	See response to Central Industrial AQ2 above.	
		2 AQ2	See Central Industrial AQ10 above	See response to Central Industrial AQ10 above.	
	Chinatown	1 IX.3	Non-residential development utilizing Agency financial assistance will be required to meet Federal, State and local standards to	See response to Central Industrial AQ10 above.	
Noise	Central Industrial	1 N1	Consistent with the City of Los Angeles Noise Ordinance, construction shall be limited to the hours between 7:00 a.m. and 9:00 p.m. on weekdays, and between the hours of 8:00 a.m. and 6:00 p.m. on Saturdays. Construction shall be prohibited on Sundays.	Not necessary and infeasible. This is part of the regulatory framework. The LAMC limits construction between 7:00 a.m. and 9:00 p.m. on weekdays, and between 8:00 a.m. and 6:00 p.m. when activities would be located within 500 feet of residences on any Saturdays or anytime on Sundays or federal holidays. As a policy matter, the City finds imposing additional limitations on construction hours of operation other than those in the Noise Ordinance and Section 41.40 is unnecessary and undesirable and would not result in good public policy related to construction in the City.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.11 (Noise) - less than significant impacts to permanent noise increases due to stationary and mobile operational activities; significant and unavoidable impacts generated by temporary construction noise.
		2 N2	Prior to the issuance of a Building Permit for projects within the proposed Project Area, the Agency shall verify that truck haul routes have been designated, and that these routes to the greatest extent feasible avoid residential areas and schools.	See response to Central Industrial AQ8 above.	
		3 N3	Major construction sites within 500 feet of a school shall be reviewed with the LAUSD to determine whether a construction noise mitigation program shall be implemented to mitigate noise-related disruptions. The mitigation program shall consider such measures as limited hours of construction in certain site areas to hours when the school would not be affected, providing prior notification to the school of particularly noisy activities, substitution of electric powered versus combustion engine powered equipment, and the use of temporary shrouds or barriers.	Not necessary and infeasible. Construction activities, including those near schools are subject to the Regulatory Compliance Measures adopted pursuant to the City's noise ordinances. These include LAMC Ch. IV, Article 1 Sec. 41.40 Construction Noise; LAMC Ch. Sec. 112.05 Power tools; LAMC Sec. 111.03 Ambient Noise; LAMC Sec. 112.02 HVAC system noise. As a policy matter, the City finds adopting additional noise requirements other than those in the Noise Ordinance and Section 41.40 and/or imposing additional review and standard requirements on approval of development projects and development of land is unnecessary and undesirable and would not result in good public policy related to construction in the City or be an efficient use of City resources.	
		4 N4	For new residential developments, the agency shall require an acoustical analysis and that the development shall adopt the resulting insulation and attenuation measures to minimize operational noise levels.	Not necessary and infeasible. Addresses impacts from existing environment on the Project which are not CEQA impacts. The California Noise Insulation Standards in Title 24 of the California Code of Regulations establish uniform minimum noise insulation performance standards to protect persons in new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings from the effects of excessive noise.	
		5 N5	For proposed industrial/commercial development adjacent to existing residential uses, new developments shall be constructed at such distances from sensitive noise receptors and/or be designed such that anticipated noise levels are reduced to acceptable levels.	Not necessary and infeasible. The Plan generally confines traditional industrial uses to a smaller geography than applied under the Redevelopment Plan. The Downtown Plan also proposes more contemporary Development Standards for both more traditional industrial uses, as well as newer industrial (beyond industrial, production uses, etc.) that address buffering between residential and non-residential uses. Heavy commercial and industrial use projects would be required to comply with buffering requirements when sited adjacent to more sensitive uses, and Conditional use permits (CUPs) maybe required for certain uses to allow the decision makers to assess potential inconsistencies and impose conditions to control noise for uses that may need special conditions to ensure compatibility with surrounding land uses. As a policy matter, the City finds adopting additional processes, review and requirements to address noise for the approval of development projects or construction is unnecessary and undesirable and would not result in good public policy or desirable land use outcomes.	
	City Center	1 N1	See Central Industrial N1 above	See response to Central Industrial N1 above.	
		2 N2	See Central Industrial N2 above	See response to Central Industrial N2 above.	
		3 N3	See Central Industrial N3 above	See response to Central Industrial N3 above.	
	Chinatown	3 IX.1.	The temporary intermittent increases in noise and dust during demolition and construction activities will be minimized by limiting operations to normal weekday working hours (e.g., 7 a.m. to 5 p.m.) and using normal wetting procedures during grading and demolition.	See response to Central Industrial N1 and N3 above.	
		1 IX.5.	New development utilizing Agency financial assistance will conform to applicable state and local noise standards. Specific noise	Infeasible. This applies to CRA funded and sponsored projects.	
Public Services	Central Industrial	1 PS1	The Agency shall ensure that developers of private projects to prepare security plans in consultation with the LAPD crime prevention unit prior to approval of site-specific developments within the proposed Project Area. The security plans shall include consideration of issues such as on-site private security officers for new development security lighting and surveillance equipment for interior and exterior building areas.	Not necessary and infeasible. The Downtown Plan includes a policy to continue interagency coordination with LAPD. Discretionary projects that include CEQA review would be subject to CPTED (Crime Prevention Through Environmental Design). As a policy matter, the City finds adopting additional review requirements and standards for residential projects to address security features is unnecessary and undesirable and would not be an efficient use of City resources.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically Section 4.13 (Public Services) - less than significant impact related to police protection services.
		2 PS2	Additional police personnel and equipment shall be provided as needed by the City in order to maintain an adequate level of police protection to the proposed Project Area. Sources of funding for additional personnel and equipment could include fees generated by the new development as a result implementation of the proposed Project.	Not necessary and infeasible. Development projects within the City pay administrative fees which contribute to a general fund. A portion of the general fund is included in the LAPD budget allocation for each fiscal year. As a policy matter, the City finds creating or adopting new development fees for the purposes of funding police equipment and personnel is unnecessary and undesirable and would not be an efficient use of City resources.	

		School	3	PS3	Payment of school facility fees according to Government Code Section 65995, as amended by Senate Bill 50, is considered "full and complete school facilities mitigation" for purposes of CEQA (Gov. Code Section 65996, subdivision). The proposed project includes all public and private activities done in furtherance of the proposed project, including development projects undertaken for purposes of development in furtherance of the proposed project.	Not Necessary. This is part of the regulatory framework. California Government Code Section 65995 found in Title 7, Chapter 4.9 of the California Government Code authorizes school districts to collect impact fees from developers of new residential and commercial/industrial building space.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically Section 4.13 (Public Services)- less than significant impacts related to schools.
		Park & Recreation		PS4	The proposed Redevelopment Plan shall identify the provision of additional parkland and active recreational facilities as specific needs within the proposed Project Area. The Plan shall also include funding or other in-kind contributions to provide for parkland acquisition consistent with Department of Recreation and Parks facility programming, the identification of specific acquisition opportunities, and the availability of tax increment or other Agency resources.	Infeasible. The Downtown Plan includes zoning standards with requirements for amenity and open space provisions for residential and nonresidential buildings within the plan area. Additionally, the Downtown Plan includes policies for ongoing interagency coordination with other departments and agencies on park acquisition and maintenance, as well as park access. Quimby fees, which fund parks, are required for development projects that include new residential dwelling units and the City has park fees. As a policy matter, the City finds adopting additional programs, requirements or incentive systems to obtain open space and recreational space and amenities is unnecessary and undesirable and would not result in good public policy or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically Section 4.14 (Recreation) - potentially significant impacts related to the deterioration of existing parks.
				PS6	Businesses shall be encouraged to invest more in on-site facilities to provide recreation to employees during breaks and lunch hours.	Not Necessary. The Downtown Plan includes zoning standards with amenity and open space provisions for residential and non-residential buildings within the Plan Area. These provisions would serve all building occupants, i.e. residents and employees.	
			4-5	PS6	In addition to Quimby fees collected from developers of residential projects, developers of commercial/industrial projects shall be encouraged to provide their buildings' occupants with some basic park features in certain portions of their landscaped areas.	See response to PS4 above.	
				PS7	The proposed Central Industrial Redevelopment Project is primarily an industrial area with a large industrial workforce and a few areas of residential uses. Per the 30-Year Work Program, up to five pocket parks of 15,000 square feet each (total 1.7 acres) shall be added to serve as a place of respite for the industrial workforce and for the area residents.	Not necessary and infeasible. The Downtown Plan includes incentives for the provision of open space. The City also has a Quimby Fee paid by developers that is utilized by the Recreation and Parks department and the Park fee is used to develop new parks.	
				PS8	The Agency shall provide up to an additional 5 acres of park space within the Project Area over the life of the Program commensurate with the increase in housing that results in the Proposed Project Area.	See response to PS7 above. Additionally, to the extent this created a funding obligation, the City did not receive funds from CRA-LA to fulfill this obligation.	
		Utilities & Solid Waste		U1	The Agency shall require, through its project design and Site Plan Review process, that all feasible and reasonable measures have been taken to reduce water consumption, including, but not limited to, systems to use reclaimed water for landscaping (should reclaimed water become available to the City), drip irrigation, recirculating hot water systems, water-conserving landscape techniques (such as mulching, installation of drip irrigation systems, landscape design to group plants of similar water demand). The Agency shall require that adequate areas on-site be set aside for solid waste source separation and collection.	Not necessary. The City has programs supporting water conservation, consistent with State law. Projects would be required to comply with the City's water conservation ordinances, such as the Model Water Efficient Landscape Ordinance, and Supply Ordinance No. 165004 to reduce water consumption, in order to obtain building permits in the City of Los Angeles. As a policy matter, the City finds adopting additional processes, review and requirements to address utilities for the approval of development projects or construction is unnecessary and undesirable and would not result in good public policy or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically Section 4.17 (Utilities & Service Systems)- less than significant impacts related to solid waste.
				U2	The Agency shall require that adequate areas on-site be set aside for solid waste source separation and collection.	Not necessary. AB 341 requires Mandatory Commercial Recycling in California as of July 1, 2012. Businesses, public entities that subscribe to waste collection services, and multi-family residential properties will five or more units are required to have a recycling program.	
				U3	For major developments within the proposed Project Area, the Agency shall require the incorporation of an on-site recycling and conservation program, including waste management techniques, aggressive use of recycled materials and furnishings or other recycling/conservation measures.	See response to U2 above.	
	City Center	Police Services		PS1	The Agency shall require developers of private projects to prepare security plans in consultation with the LAPD crime prevention unit prior to approval of site-specific developments within the proposed Project Area. The proposed plans shall include consideration of issues such as on-site private security officers, video surveillance equipment for interior and exterior building areas, and secured entryways as recommended by the Police Department during their review.	See response to Central Industrial PS1 above.	
				PS2	Additional police personnel and equipment shall be provided as needed by the City in order to maintain an adequate level of police protection to the proposed Project Area. Sources of funding for additional personnel and equipment could include fees generated by the new development as a result of implementation of the proposed Redevelopment Project.	See response to Central Industrial PS2 above.	
		School		PS3	Payment of school facility fees according to Government Code Section 65995, as amended by Senate Bill 50, is considered "full and complete school facilities mitigation" for purposes of CEQA. (Government Code Section 65996, subdivision).	See response to Central Industrial PS3 above.	
		Parks & Recreation		PS4	The proposed Redevelopment Plan shall identify the provision of additional parkland and active recreational facilities as specific needs within the proposed Project Area. The Plan shall also include funding or other in-kind contributions to provide for parkland acquisition consistent with Department of Recreation and Parks facility programming, the identification of specific acquisition opportunities, and the availability of tax increment or other Agency resources.	See response to Central Industrial PS4 above.	
				PS5	See Central Industrial PS5 above	See response to Central Industrial PS5 above.	
				PS6	See Central Industrial PS6 above	See response to Central Industrial PS6 above.	
				PS7	Per the proposed City Center Redevelopment Project's 5-Year Implementation Plan, the Agency shall conduct identification of sites and pre-assembly work for a large park and start construction of one pocket park (15,000 square feet or 0.34 acres). Per the 30-Year Work Program, an additional six pocket parks of 15,000 square feet each (total 2.06 acres) and two large parks of 200,000 square feet each (total 9.18 acres) shall be added.	See response to Central Industrial PS6 above.	
		Utilities & Solid Waste		U1	The Agency shall require, through its project design and Site Plan Review process, that all feasible and reasonable measures have been taken to reduce water consumption, including, but not limited to, systems to use reclaimed water for landscaping (should reclaimed water become available to the City), recirculating hot water systems, water-conserving landscape techniques (such as mulching, installation of drip irrigation systems, landscape design to group plants of similar water demand, soil moisture sensors, automatic irrigation systems, clustered landscaped areas to maximize the efficiency of the irrigation system), water conserving kitchen and bathroom fixtures and appliances, thermostatically controlled mixing valves for baths and showers, and insulated hot water lines, as per City adopted code requirements.	See response to Central Industrial U1 above.	
				U2	The Agency shall require that adequate areas on-site be set aside for solid waste source separation and collection. For commercial projects and housing projects with more than 20 residential units, commercial size trash compactors shall be installed in all portions of each component of the project.	See response to Central Industrial U2 above.	
				U3	For major developments within the proposed Project Area, the Agency shall require the incorporation of an on-site recycling and conservation program, including waste management techniques, aggressive use of recycled materials and furnishings or other recycling/conservation measures.	See response to Central Industrial U3 above.	
	Chinatown	Police Services	1	IX.6.	The impact of Agency-sponsored new development on police services will be reduced by the installation of adequate security lighting, City-approved security hardware on all doors and windows, and viewing holes in the entrance doors of individual dwelling units. Residents will be encouraged to develop neighborhood watch programs. Private developers should consult with the police department regarding security measures appropriate for the particular projects	See response to Central Industrial PS1 above.	
Hazards & Risk Upsets	Central Industrial			HR1	If alluvial deposits underlying a specific project site are determined susceptible to seismically induced settlement, site-specific recommendations shall be made to mitigate this hazard. Mitigation alternatives include foundations on piles or caissons driven into deeper subsurface materials that are not settlement-prone, or compaction of the near-surface soil materials to decrease their susceptibility to settlement.	Not necessary. The City of Los Angeles relies on Municipal Code Chapter IX, Article 1, Building Code, (the LABC), which incorporates the CBC, to provide geotechnical hazard prevention regulations. In general, the LABC includes requirements for construction and ground disturbance that could affect geologic risks, as well as standards for building foundations, earthquake/seismic structural designs, and development within landslide susceptible areas. Division 18 of Article 1, in adopting the CBC, provides guidance for development located on expansive soils; Division 70 provides general construction, grading and site excavation requirements and restricts issuance of grading permits for development in landslide areas, unless a soil investigation is prepared by an engineer registered by the State of California and is approved by the City.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, see Section 4.6 (Geology & Soils) less than significant impacts related to geology and seismic hazards.
				HR2	A state-certified geologist shall review all excavations for future projects within the proposed Project Area for evidence indicative of faulting, or seismically induced ground deformation. If during grading, an active fault is determined to extend through the site, appropriate building setbacks from the fault line shall be established.	Not necessary. LADBS requires surface fault rupture hazard investigations for projects located within an official or preliminary Alquist-Prub Earthquake Fault Zone (APEFZ), and/or within a City of Los Angeles Preliminary Fault Rupture Study Areas (PPRSA). As a policy matter, the City finds adopting additional regulations or restrictions to address geological hazards is undesirable and unnecessary, would be an inefficient use of City resources and result in undesirable land use and building design outcomes.	
				HR3	For site-specific developments within the proposed Project Area, a qualified geologist shall perform a geological investigation. The scope of the investigation shall be developed in coordination with the City of Los Angeles Department of Building and Safety. The geological investigation shall reasonably address settlement, corrosion, oil, ground shaking, liquefaction, and subsidence. As appropriate, mitigation measures shall be identified and implemented with the approval of the Department of Building and Safety.	Infeasible and not necessary. The California Building Code has requirements (CBC Appendix J) for all grading, excavation, and earthwork construction, and prohibits grading from occurring without first having obtained a permit from the building official. Appendix J of the CBC requires the preparation of a geotechnical report that notes the distribution of existing soils, conclusions and recommendations for grading procedures, soil design criteria for any structures or embankments required to accomplish the proposed grading, and where necessary, slope stability studies, and recommendations and conclusions regarding site geology. This applies to projects that include grading, excavation, and earthwork and not just for construction of a new building. To the extent that this mitigation is to address impacts from existing conditions to future residents of the project, those are not CEQA impacts pursuant to CBA v. BAAQMD.	
				HR4	If inactive, abandoned or unidentified oil wells are encountered during the planning or implementation of development within the proposed project area, the State of California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOG) shall be contacted to identify the well and to evaluate whether or not the well has been properly abandoned. The DOG will require proper abandonment or re-abandonment of an oil well if the well is to be located under any proposed structure. If the wells found to have been properly abandoned, and will not be located under a proposed structure, the DOG may not require re-abandonment.	Not necessary. LAMC Section 91.6105 prohibits the development of specific uses and buildings in proximity to an oil well casing. These include schools, sanitariums, day care centers, child day care centers, or public utility generating, receiving, or distributing electricity, and buildings more than 400 square feet in area and taller than 36 feet in height. In addition, in accordance with LAMC Section 91.7109.2, any abandoned oil well encountered during construction is required to be evaluated by the Fire Department and may be required to be re-abandoned in accordance with applicable rules and regulations of the California Division of Oil, Gas, and Geothermal Resources (CALGEM).	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, see Section 4.6 (Hazards & Hazardous Materials)- less than significant impacts related to oil wells.
				HR5	Soils shall be evaluated on a project-by-project (basis, and appropriate mitigation recommended. If found, all compressible materials shall be removed and replaced as compacted fill (with the exception of peat, which shall be removed from the fill). The criteria for leaving surficial soils in place should be consistent with the grading specifications of the City of Los Angeles. Other recommendations may include deep pile, or caissons to support the structures, and/or in-place mechanical densification of compressible layers.	Not necessary. Future development would be required to comply with Division 18, Soils and Foundations, of the LABC, which adopted Chapter 18 of the CBC by reference. Therefore, future development would be required to comply with the CBC regarding the minimum standards for structural design and site development. An acceptable degree of soil stability can be achieved for soil materials by the CBC-required incorporation of soil treatment programs (replacement, grouting, compaction, drainage control, etc.) in the excavation and construction plans to address site-specific soil conditions. Adherence to these requirements would achieve accepted safety standards relative to unstable geologic units or soils.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, see Section 4.6 (Geology & Soils) less than significant impacts related to geology and seismic hazards.
				HR6	If soils underlying the site-specific project are determined susceptible to ground lurching, special foundation recommendations	See response to Central Industrial HR5 above.	
				HR7	If soils underlying the site specific proposed project are determined to be highly expansive, they shall be mitigated by special	See response to Central Industrial HR5 above.	
				HR8	Property specific Phase One and Phase Two environmental testing shall be performed prior to new development in the Project Area. If soil and/or groundwater contamination or the presence of underground storage tanks are identified prior to the implementation of new development, proper remediation of the soil and/or groundwater and removal of the tank shall be performed in conformance with all federal, state and local regulations.	Not necessary and infeasible. The DEIR discusses issues concerning soil disturbance in Section 4.8, Hazards and Hazardous Materials. The section includes a mitigation measure that requires full database research for discretionary projects that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry-cleaning facility on-site. This initial database search could result in the need to complete a Phase I and Phase II Assessment. As a policy matter, the City finds adopting additional processes, review and requirements to address hazardous materials for the approval of development projects or construction is unnecessary and undesirable and would not result in good public policy or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, see Section 4.8 (Hazards & Hazardous Materials) less than significant impacts related to oil wells; less than significant impacts related to lead and asbestos exposure.

City Center	8	HR9	On a project-by-project basis, a survey to test for asbestos-containing building materials, lead-based paints, and PCBs, shall be performed, as necessary. This survey shall be subject of the approval of the Agency. PCB and lead-based paint analysis and removal shall be performed in conformance with federal, state, and local regulations.	Not necessary. It is already part of the regulatory framework because it is a requirement of SCAQMD's Rule 1403, which was enacted in 1989. In addition, per mitigation measure in the Section 4.2, Air Quality of these DEIR, construction contractors for all discretionary projects that involve construction-related activity are required to implement best available dust control measures during active construction operations capable of generating dust, consistent with SCAQMD Rule 403.			
	9	HR10	All activities associated with asbestos shall be conducted under the direct supervision of a certified asbestos consultant.	Not necessary. The DEIR discusses the issues concerning demolition in Section 4.8, Hazards and Hazardous Materials. Section 4.8 includes a mitigation measure to reduce asbestos release during demolition.			
	10	HR11	Individual project sponsors shall obtain all necessary regulatory agency permits prior to implementation of subsequent.	Not necessary. The regulatory framework includes thresholds for project review and permitting.			
	11	HR12	Any project involving hazardous waste generation shall, utilize only the services of properly trained and qualified hazardous waste	Not necessary and infeasible. To ensure that workers and others at individual development sites in the Downtown Plan Area are not exposed to unacceptable levels of			
	1	HR1	See Central Industrial HR1 above	See response to Central Industrial HR1 above.			
	2	HR3	See Central Industrial HR2 above	See response to Central Industrial HR2 above.			
	3	HR3	See Central Industrial HR3 above	See response to Central Industrial HR3 above.			
	4	HR4	Studies shall also be conducted prior to development approval on a project-by-project basis "where saturated conditions exist near the ground surface." These studies would evaluate water depths and soil conditions and identify any areas that have the potential for liquefaction.	Not necessary. Reasonably expected development from the Downtown Plan would be subject to existing requirements, regulations and policies provided in the LABC, which would ensure that reasonably expected development from the Downtown Plan would not increase or otherwise alter the potential for impacts related to on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse compared to existing conditions. The DEIR also discusses requirements to ensure that soil and/or groundwater contamination that may be present on Downtown Plan Area properties are identified and, as necessary, remediated in Section 4.8, Hazards and Hazardous Materials.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, see Section 4.6 (Geology & Soils) and Section 4.8 (Hazards and Hazardous Materials) for no or less than significant impacts related to geology and seismic hazards.		
	5	HR5	In those areas determined susceptible to liquefaction, special foundations shall be provided to mitigate this hazard. Possible mitigation recommendations may include deep piles or caissons to support the planned structures and/or mechanical densification of subsurface soils prone to liquefaction.				
	6	HR6	Any loose liquefaction-prone sediments occurring on a specific development site shall be compacted to appropriate City standards to reduce liquefaction potential. Additionally, foundations and footings for all developments within susceptible areas shall be designed in accordance with City of Los Angeles Code standards to reduce the potential for structural failure associated with liquefaction.				
	7	HR7	See Central Industrial HR4 above.	See response to Central Industrial HR4 above.			
	8	HR8	See Central Industrial HR5 above	See response to Central Industrial HR5 above.			
	9	HR9	See Central Industrial HR6 above	See response to Central Industrial HR6 above.			
	10	HR10	See Central Industrial HR7 above	See response to Central Industrial HR7 above.			
	Chinatown	11	HR11	See Central Industrial HR8 above	See response to Central Industrial HR8 above.		
11		HR12	A Phase One type environmental assessment shall be required for all Agency-sponsored or funded projects that involve	See response to Central Industrial HR8 above.			
12		HR13	All new businesses that involve the handling, manufacturing, or generation of known hazardous materials shall be reviewed by the	See response to Central Industrial HR12 above.			
13		HR14	Individual project sponsors shall obtain all necessary regulatory agency permits prior to implementation of subsequent	See response to Central Industrial HR11 above.			
15		HR15	Prior to new construction, a qualified environmental professional shall evaluate any identified soil and/or groundwater contamination. Lateral and vertical extent of soil contamination, lateral extent of groundwater contamination, and remedial options shall be determined in conformance with applicable City, State and Federal standards. Remediation measures shall be implemented, as determined necessary by local oversight agencies, such as the City of Los Angeles Fire Department, California Environmental Protection Agency, Los Angeles Department of Public Works, and the California Regional Water Quality Board.	See response to Central Industrial HR11 above. Infeasible and not necessary. The Proposed Project DEIR, Section 4.8, Hazards and Hazardous Materials proposed mitigation measure requires full database research for discretionary projects that involve construction-related soil disturbance located on land within 1/4-mile of an identified active hazardous material site. This initial database search could result in the need to complete a Phase I and Phase II Assessment. In addition, LAMC Article 4.4 requires that a project include construction Best Management Practices (BMPs) to prevent contamination of stormwater and runoff in its project plans. These BMPs are subject to City review and are required to be implemented during construction. As a policy matter, the City finds adopting additional processes, review and requirements to address hazardous materials for the approval of development projects or construction is unnecessary and undesirable and would not result in good public policy or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and specifically, see Section 4.8 (Hazards & Hazardous Materials)- less than significant impacts related to soil and ground water contamination		
1		IX.7.	Some of the proposed circulation improvements (e.g., street widening, provision of adequate turnaround areas, improved alley access) will be beneficial from a fire safety standpoint.	Infeasible. As written, the action set forth in this mitigation measure is unclear and therefore infeasible.			
2		IX.7.	The rehabilitation program will include activities to reduce fire hazards, including repair or installation of electrical wiring in conformance with existing building codes, and elimination of accumulated litter.	See response to IX.7. above. Additionally, unnecessary because the Fire Code provides requirements to address fire hazards from new construction or remodels.			
Hydrology & Water Quality		Central Industrial	1	H1	All projects, where applicable, shall use permeable surfaces to minimize the transport of pollutants. All projects where applicable, shall be required to establish an erosion control plan prior to construction.	Not necessary. All future developments in the Downtown Plan Area would be required to comply with the LID Ordinance and Stormwater and Urban Runoff Pollution Control Ordinance, which require the inclusion of BMPs in a project's design to prevent, control, and reduce stormwater pollutants. The City's Stormwater and Urban Runoff Pollution Control Ordinance requires future development to comply with the SUSMP requirements, if applicable and integrate LID practices and standards for stormwater pollution mitigation, and maximize open, green, and pervious space on all development consistent with the City's landscape ordinance and other related requirements. As a policy matter, the City finds adopting additional processes, review and requirements to address hazardous materials for the approval of development projects or construction is unnecessary and undesirable and would not result in good public policy or desirable land use outcomes.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.19 (Hydrology)- less than significant impacts related to erosion and transport of pollutants
			H2	The Agency shall require all applicants for development to include drainage plans to be reviewed by Bureau of Engineering prior to project approval.	See response to H1 above.		
			2-3	H3	All subsequent site specific projects which are determined to have a significant effect on storm water runoff shall investigate measures to capture local rainfall on the project site, eliminate incremental increase in flows to the storm drain system and provide filtering of flows to capture contaminants originating from the project site.	Not necessary. Discussion of impacts in DEIR Section 4.9 Hydrology and Water Quality, states Downtown Plan Area development would generally involve redevelopment of already developed sites so would not substantially increase impervious surface area or runoff. New development would also be subject to the existing regulatory framework, which in many cases would reduce peak runoff rates.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.19 (Hydrology)- less than significant impacts related to storm water run-off
		City Center	4	H4	All projects, where applicable, shall use permeable surfaces to minimize the transport of pollutants.	See response to Central Industrial H1 above.	
			1	H1	The Agency shall require projects to obtain proper discharge permits, as required by the Regional Water Quality Control Board.	See response to Central Industrial H1 above.	
			2	H2	See Central Industrial H2 above	See response to Central Industrial H2 above.	
		Chinatown	H3	See Central Industrial H3 above	See response to Central Industrial H3 above.		
			1	IX.4.	All new development utilizing Agency financial assistance will comply with applicable building codes in regard to water and energy conservation measures. Occupants will be encouraged to implement voluntary conservation measures.	Infeasible. This applies to CRA funded and sponsored projects.	See the DEIR, Chapter 4, generally, for all impacts caused by the reasonably anticipated development under the Downtown Plan, and see specifically, Section 4.17 (Utilities)- less than significant impacts related to water supply; Section 4.15 (Energy)-less than significant impact with respect to energy consumption.



