

3.0 SCEA CRITERIA

3.1 REGULATORY BACKGROUND/SENATE BILL 375

As noted in Section I, Introduction, of this SCEA, the State of California has adopted SB 375, also known as “The Sustainable Communities and Climate Protection Act of 2008,” which outlines growth strategies that better integrate regional land use and transportation planning in order to help meet the State of California’s GHG emissions reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations to incorporate a “sustainable communities strategy” into their regional transportation plans to achieve their respective region’s GHG emission reduction targets set by CARB. SCAG is the metropolitan planning organization that has jurisdiction over the Site.

On April 7, 2016, SCAG’s Regional Council adopted the 2016-2040 RTP/SCS, which outlines strategies to meet or exceed the GHG emission targets set by CARB: 8 percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. Under Executive Order G-16-066, approved June 28, 2016, CARB determined that the 2016-2040 RTP/SCS would achieve CARB’s 2020 and 2035 GHG emission reduction targets.¹ These targets were updated in 2018 to an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions, which became effective October 1, 2018.²

As noted in Section 1, Introduction, on September 3, 2020, SCAG’s Regional Council approved and adopted the Connect SoCal (2020–2045 RTP/SCS). Similar to the 2016-2040 RTP/SCS, the 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles (including the 2016-2040 RTP/SCS) to increase mobility options and achieve a more sustainable growth pattern, while achieving CARB’s GHG reduction targets. CARB has not yet certified the 2020-2045 RTP/SCS; accordingly, this SCEA primarily assesses the Project in relation to the 2016-2040 RTP/SCS, with supplemental references to and assessment of the 2020-2045 RTP/SCS, as applicable.

3.2 TRANSIT PRIORITY PROJECT CRITERIA

SB 375 allows the City of Los Angeles, acting as lead agency, to prepare a SCEA as the environmental CEQA clearance for TPPs that are consistent with SCAG’s RTP/SCS. For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see PRC Section 21155(a) and (b)):

¹ California Air Resources Board, Executive Order No. G-16-066, https://www.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf. Accessed September 2019.

² California Air Resources Board, SB 375 Regional Plan Climate Targets, <https://www2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets>. Accessed September 2019.

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG RTP/SCS;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is within one-half mile of a major transit stop or high-quality transit corridor included in the SCAG RTP/SCS.

As discussed below, the Project qualifies as a TPP pursuant to the above criteria.

Consistency with Criterion 1: Project uses designation, density, building intensity, and applicable policies specified for the Project area in the SCAG RTP/SCS.

Use Designation, Density, and Building Intensity

For its 2016-2040 RTP/SCS, using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types (see Figure III-1), and classified sub-regions into one of three land use development categories (LDCs): Urban, Compact, or Standard.³ 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.⁴ SCAG notes that the LDCs utilized in the RTP/SCS are not intended to represent detailed land use policies, but are used to describe the general conditions likely to occur within a specific area if recently emerging trends, such as transit-oriented development, were to continue in concert with the implementation of the 2016-2040 RTP/SCS.

The Project Site is located in an area that is within an Urban LDC – the highest density and most intense land development category assessed in the 2016-2040 RTP/SCS (refer to Figures III-2 and III-3). The RTP/SCS defines the Urban areas as often found within and directly adjacent to moderate and high-density urban centers. The most intense development types are anticipated in the Urban LDC, as compared to Compact and Standard LDCs.

According to the 2016-2040 RTP/SCS, “nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multi-family and attached single-family (townhome), which tend to consume less water and energy than larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.”⁵

The Urban LDC comprises multiple urban footprint scenario models, including Urban Mixed Use, Urban Residential, Urban Commercial, City Mixed Use, City Residential, and City Commercial.⁶

³ SCAG, 2016-2040 RTP/SCS, Page 20, accessed at <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.

⁴ SCAG, 2016-2040 RTP/SCS, Pages 20-21, accessed at <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.

⁵ Ibid.

⁶ SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 9, 2016; SCAG, 2016-2040 RTP/SCS Background Documentation, Reference Document 6.

The Project Site would be consistent with the Urban Residential and City Residential place types within the Urban LDC, as described further below.

- **Urban Residential:** The land use mix for the Urban Residential place type is 64 percent residential, 4 percent employment, 12 percent mixed use, and 21 percent open/civic space. The Urban Residential place type is typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking is usually structured below or above ground. Residents within Urban Residential place types are well served by transit and can walk or bicycle for many of their daily needs. Residential density may range from 75-500 households per acre, building heights may range from 5-60 stories, and total net FAR of the built environment within this place type may achieve 9.0:1.
- **City Residential:** Similar to the Urban Residential land use mix, the land use mix for the City Residential place type is 65 percent residential, 4 percent employment, 11 percent mixed use, and 20 percent open/civic space. The City Residential place type is a dense residential-focused type, dominated by mid- and high-rise residential towers, with some ground-floor retail space. Parking is usually structured, below or above ground. Residents are well served by transit and can walk or bike for many daily needs. Residential density may range from 35-75 households per acre, building heights may range from 5-40 stories, and total net FAR of the built environment within this place type may achieve 2.9:1.

The Project is consistent with the Urban LDC and the Urban Residential and City Residential place types described in the 2016-2040 RTP/SCS, as it is located within a highly urbanized area within the City of Los Angeles and proposes to develop uses and buildings that are consistent with the contemplated place types of the RTP/SCS (residential and institutional mixed-uses). Specifically, the Project Site is surrounded by higher-density urban land uses, including high-rise multi-family residential buildings within the Wilshire-Westwood Scenic Corridor Specific Plan and high-rise commercial buildings within the City of Los Angeles General Plan Regional Center land use designation immediately to the west of the Project Site. Moreover, the Project Site is well served by existing and proposed transit infrastructure, including multiple bus transit lines along both Wilshire and Westwood Boulevards, as well as the future Westwood/UCLA Station for Metro's Purple Line Extension. Although the Urban and City Residential place types states that building heights may range from 5–60 stories for Urban Residential and 5-40 stories for City Residential, the two-story Education Center is consistent with the existing one and two-story single-family residences located to the east and south of the Project Site and contributes to the 11-12% mixed use land use mix that is identified as being part of the Urban and City Residential place types.

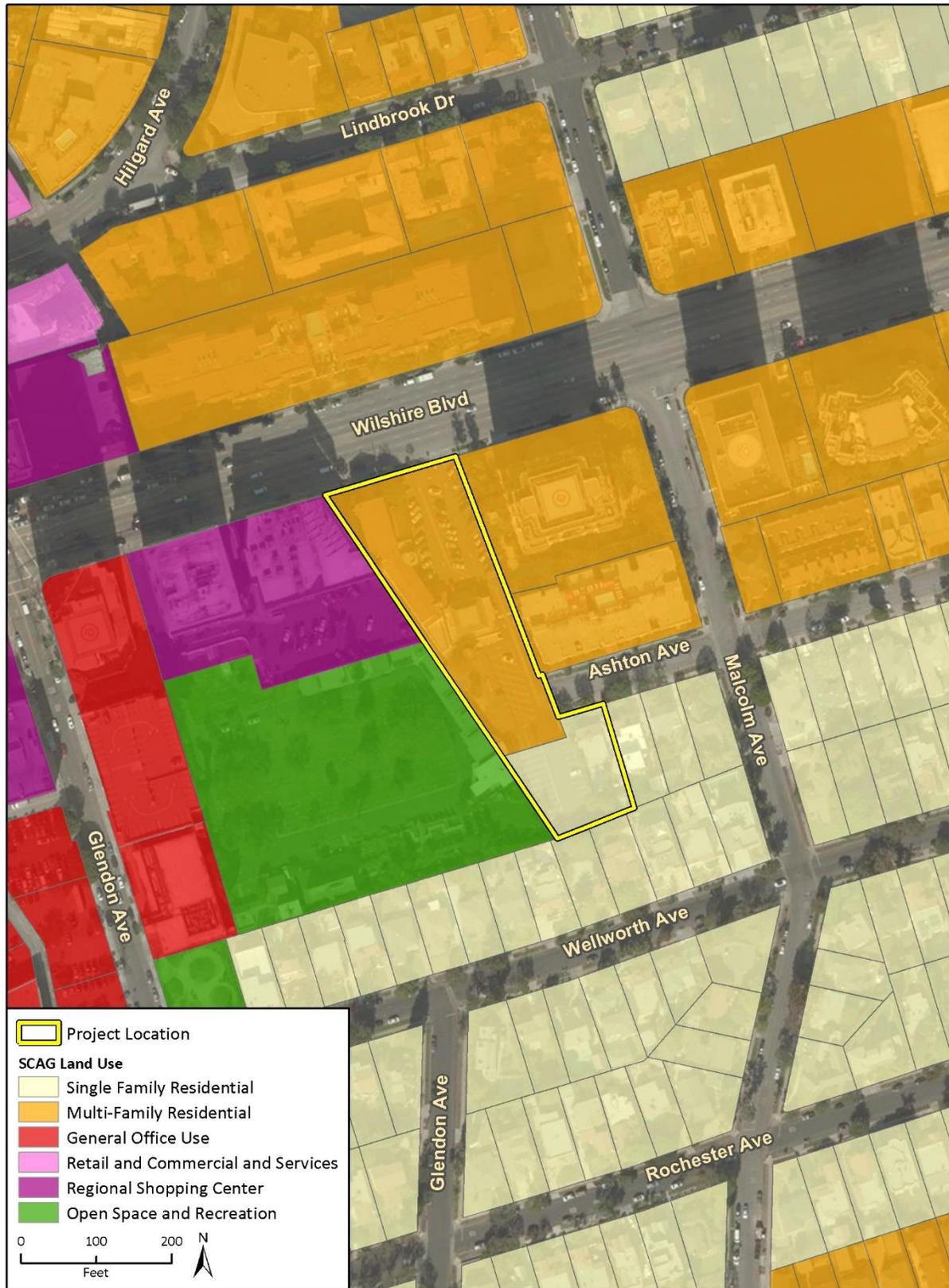
At this highly urban location, the Project would develop a new 12-story, 153-foot-tall high-rise building containing a total of 176 senior residential units and guest rooms, while retaining the Project Site's existing Sanctuary. The southern portion of the Project Site would include the Education Center, which would consist of a childcare facility and administrative offices for use by the Church in a new low-rise, two-story building which would provide a transition between the greater height and density of the Eldercare Facility and the reduced density and height of the single-family neighborhoods to the south and east of the Project Site. The vast majority of the Project's parking spaces would be located in a new subterranean parking garage, consistent with the characteristics of the Urban and City Residential place types. The Eldercare Facility would contain 53 dwelling units and 123 guest rooms on an approximately one-acre portion of the Project Site, which is consistent with the range of residential densities contemplated by both the Urban and City Residential place types. The Eldercare Facility would result in a FAR of approximately

5.45:1, while the new Education Center would result in a FAR of 1.24:1, both of which are generally consistent with the FAR contemplated for the Urban and City Residential place types. As such, the Project's scale, location, and mixture of land uses would be consistent with Urban LDC and corresponding Urban and City Residential place types which call for developments that integrate residential uses as well as non-residential uses and subterranean parking near transit as described in the 2016-2040 RTP/SCS.

For the 2020-2045 RTP/SCS, SCAG revised its depiction of forecasted growth patterns by focusing more generally on transportation infrastructure and existing job centers in order to determine where future growth of employment and households would likely occur. Specifically, as described in the 2020-2045 RTP/SCS Sustainable Communities Strategy Technical Report, Priority Growth Areas have been identified in the region where growth is forecasted to occur due to proximity to existing and planned transit, existing job centers, existing and planned infrastructure to support more walkability and use of alternative transportation modes, and in areas identified for jurisdictional expansion (i.e. spheres of influence). These Priority Growth Areas, which are identified on Exhibit 1, Connect SoCal Forecasted Development Regional Development Pattern, of the Sustainable Communities Strategy Technical Report, include Transit Priority Areas, High Quality Transit Areas, Job Centers, Livable Corridors, and Neighborhood Mobility Areas. Collectively, these Priority Growth Areas are anticipated to contain 95 percent of the growth in the region through the horizon year of 2045.

As shown in Figure 3-4 below, the Project Site falls within an identified Priority Growth Area under the 2020-2045 RTP/SCS. In addition, as shown in Figure 3-5 through Figure 3-7, the Project Site is also located within a Transit Priority Area and High Quality Transit Area, and along a Livable Corridor. Therefore, the Project and the Project Site are consistent with SCAG's current forecasted development pattern for the region, including the general use designation, density, building intensity, and applicable policies specified for the area.

Figure 3-1 SCAG General Plan Land Use Types



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 Additional data provided SCAG, 2016.

Fig 03-1 SCAG Land Use

Figure 3-2 2016-2040 RTP/SCS Forecasted Regional Development Types by Land Development Categories (2012)

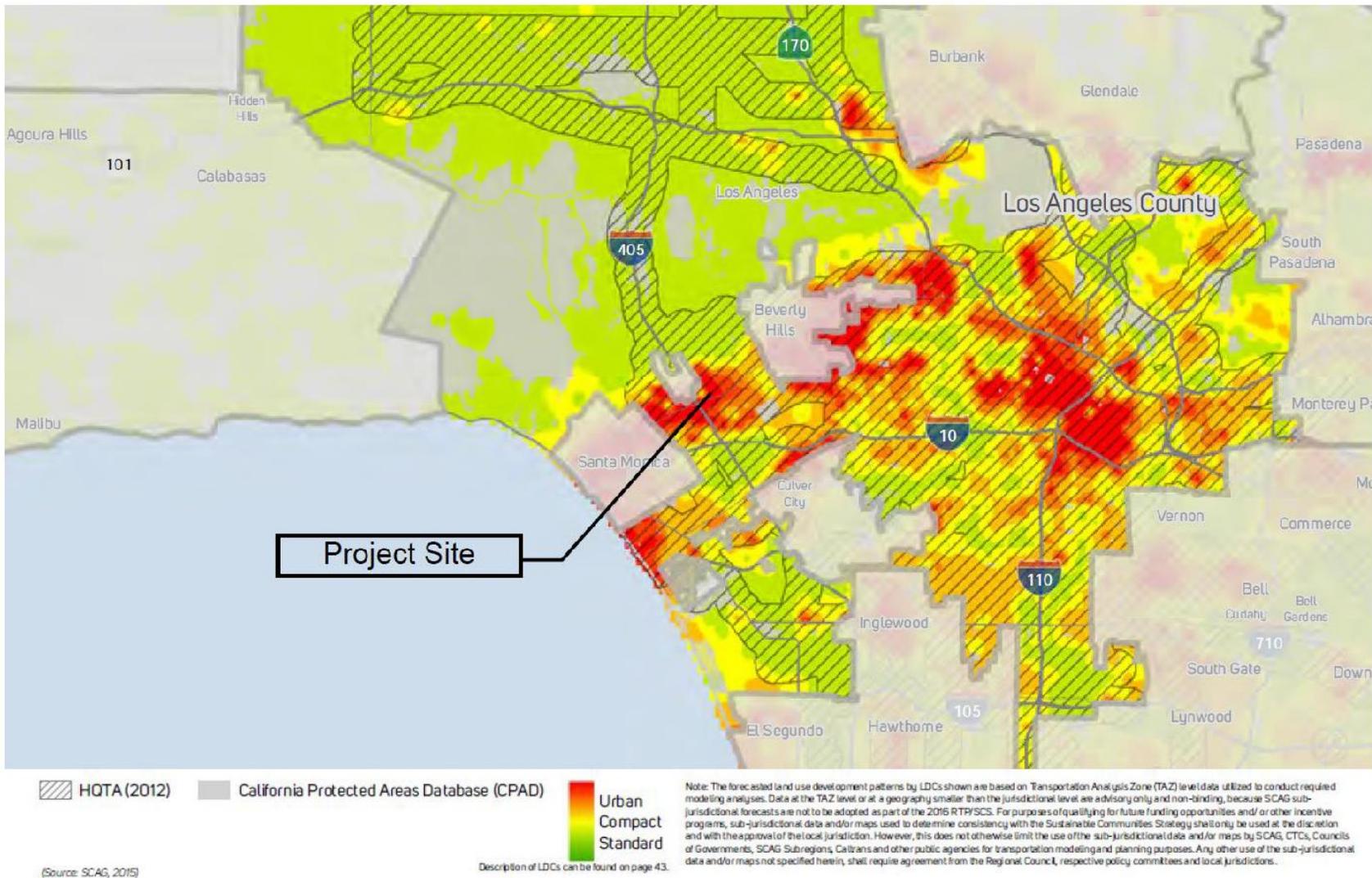


Figure 3-3 2016-2040 RTP/SCS Forecasted Regional Development Types by Land Development Categories (2040)

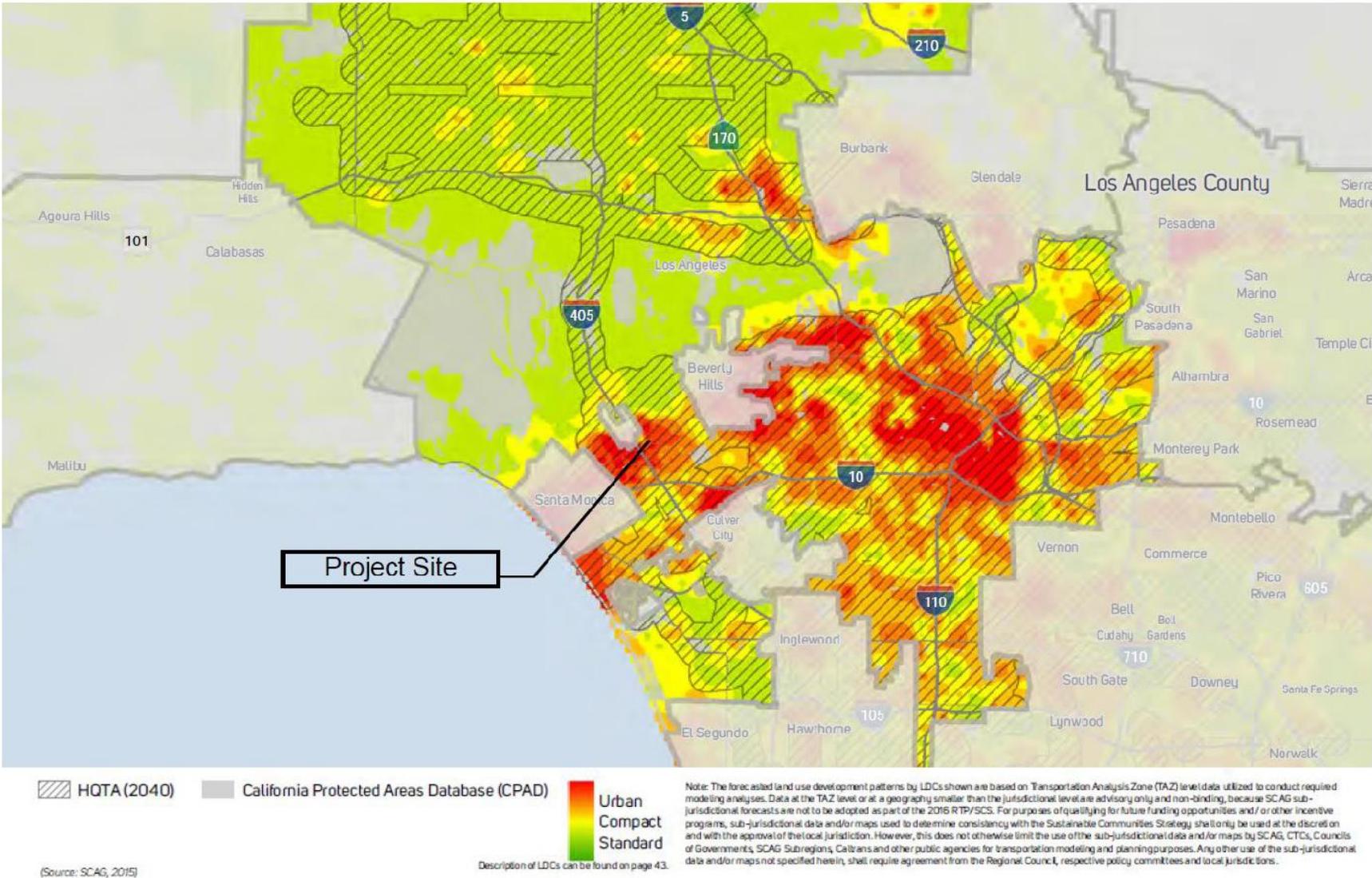


Figure 3-4 2020-2045 RTP/SCS Forecasted Regional Development Pattern

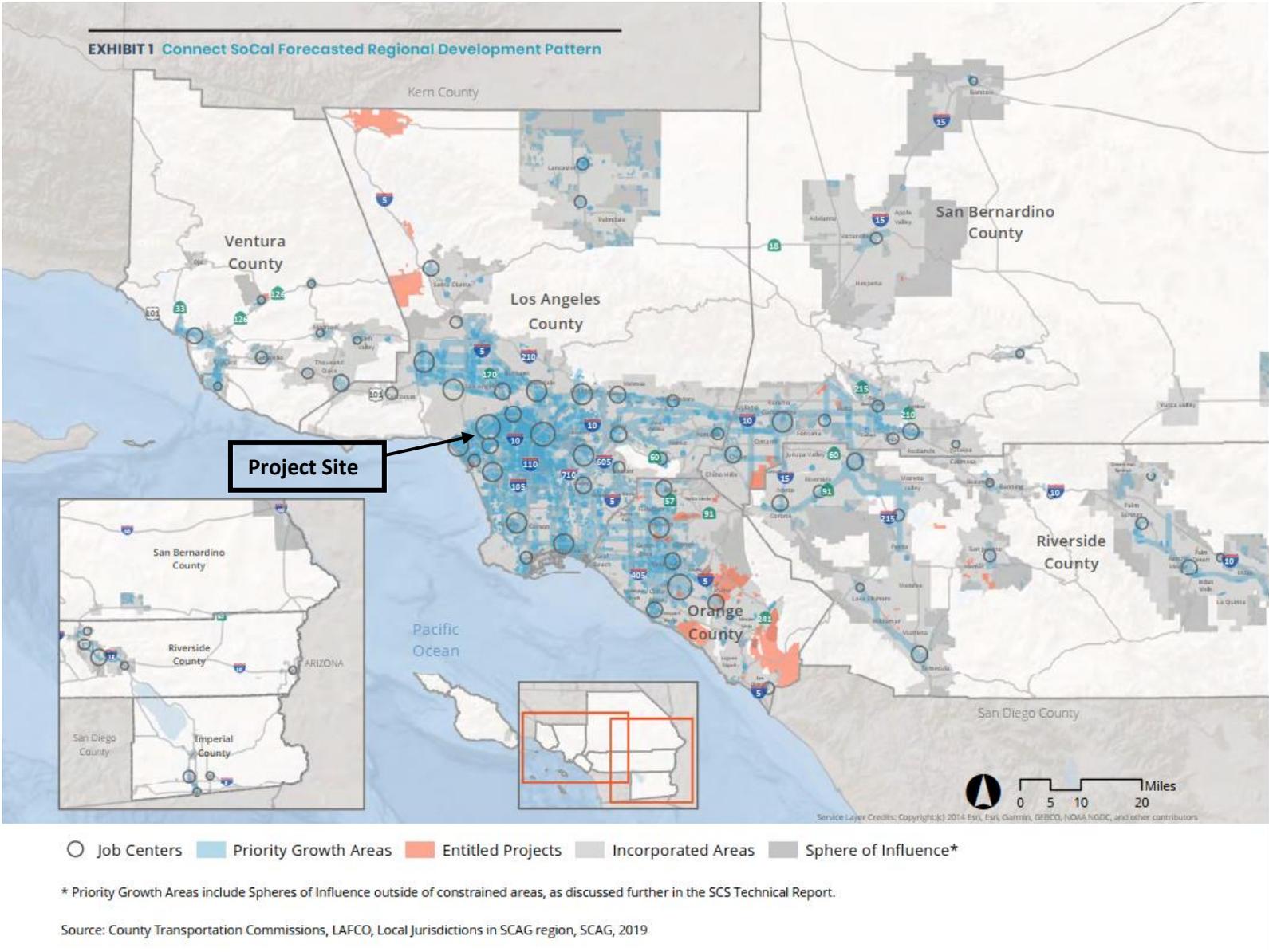
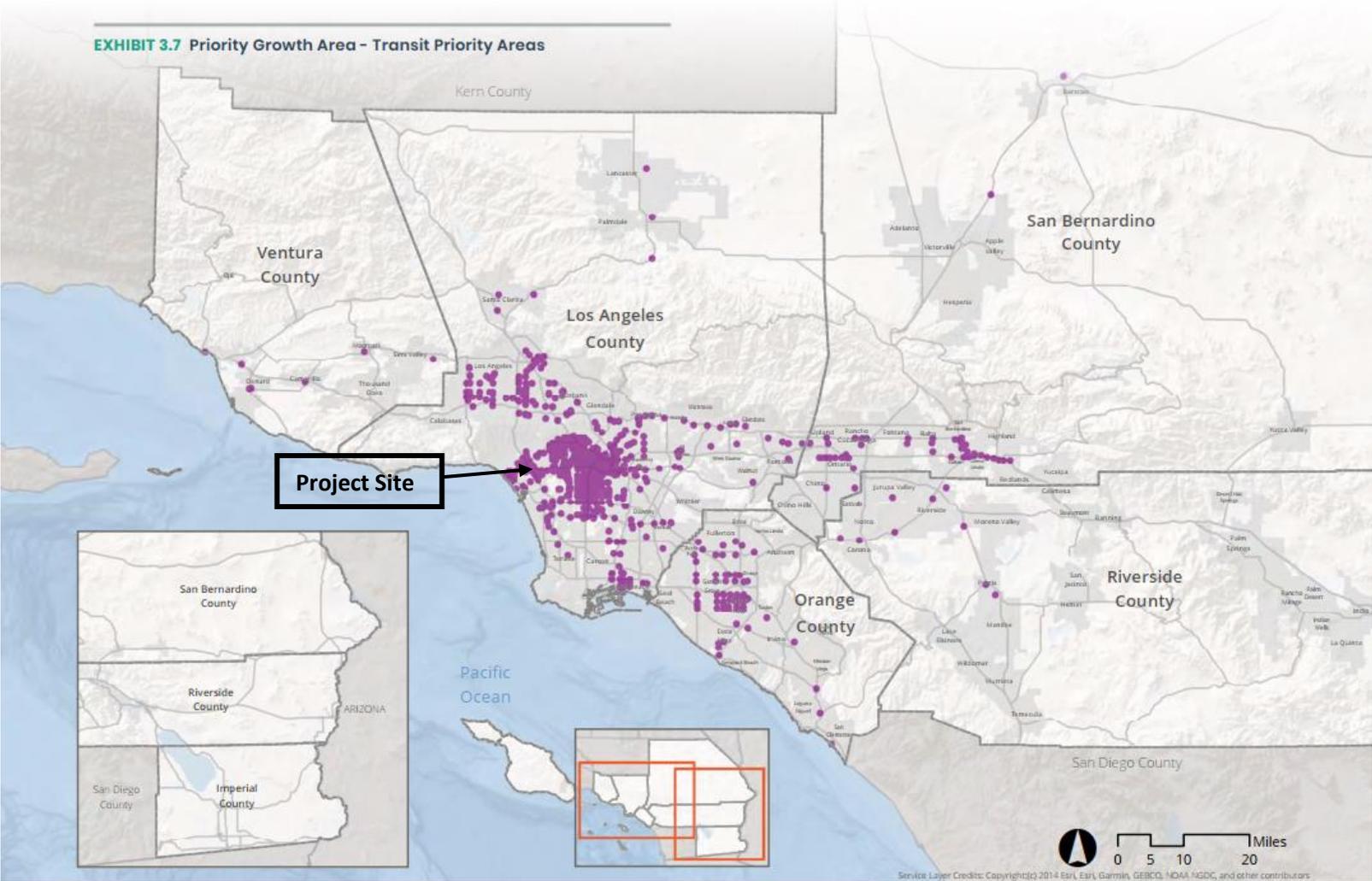


Figure 3-5 2020-2045 RTP/SCS Transit Priority Areas



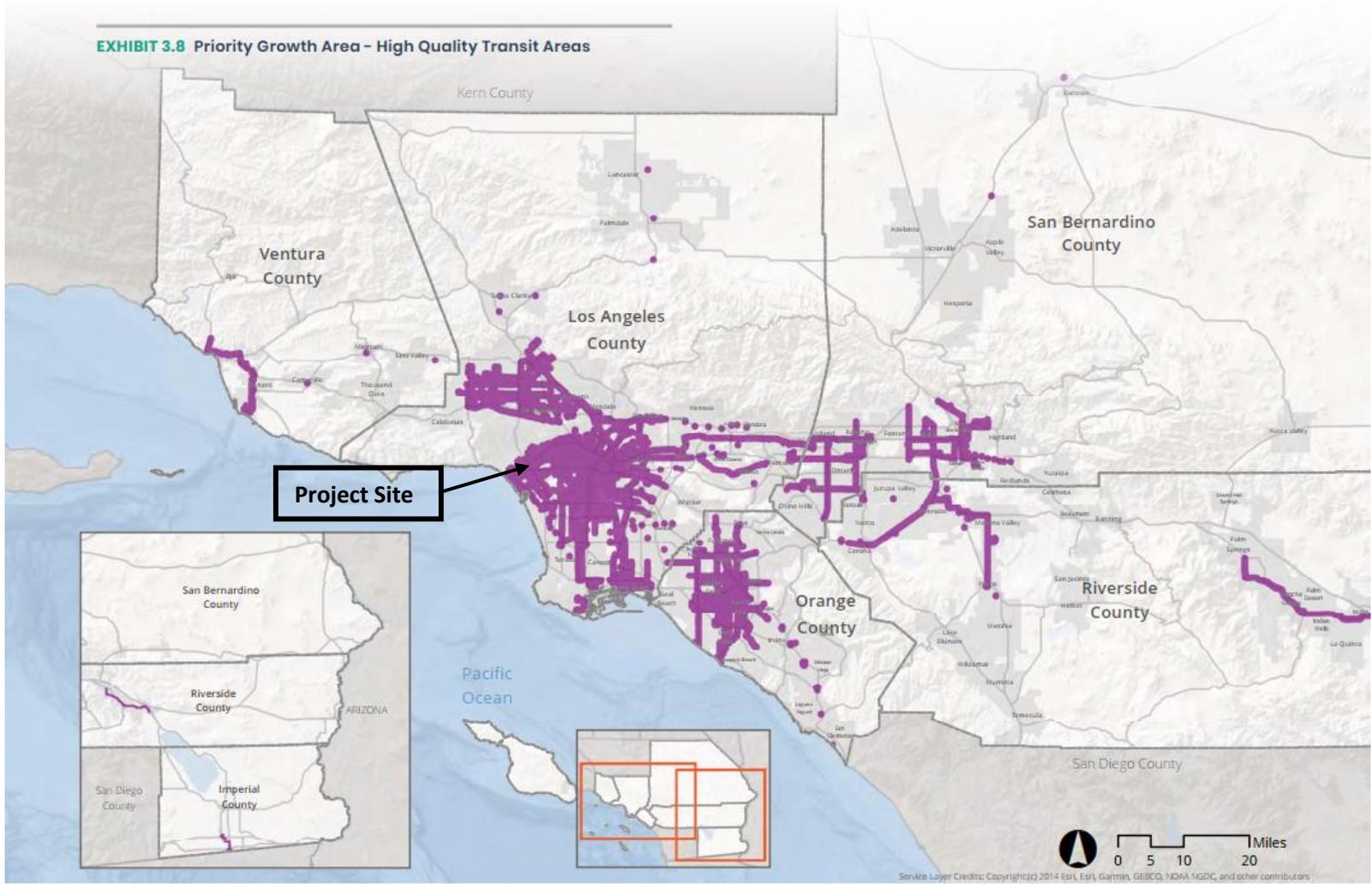
Transit Priority Areas (2045)

■ TPA

Source: County Transportation Commissions, SCAG, 2019

Note: Transit priority area (TPA) refers to an area within one-half mile of a major transit stop that is existing or planned. SCAG identifies major transit stops and transit priority areas using the methodology described in the Transit Technical Report. Major transit stops are extracted from 2045 plan year data of Connect SoCal.

Figure 3-6 2020-2045 RTP/SCS High Quality Transit Areas



High Quality Transit Areas (2045)

■ HQTA

Source: County Transportation Commissions, SCAG, 2019

Note: SCAG's High Quality Transit Area (HQTA) is within one-half mile from major transit stops and high quality transit corridors (HQTC). SCAG identifies major transit stops and HQTCs using the methodology described in the Transit Technical Report. Major transit stops and HQTCs are extracted from 2045 plan year data of Connect SoCal.

Applicable Policies Specified for the Project Area

The Project would be consistent with applicable goals and policies presented within SCAG’s RTP/SCS, as shown in the consistency analysis in Table 3-1.

**Table 3-1
Consistency Analysis with the RTP/SCS**

2016-2040 RTP/SCS Goals and Policies	Consistency Assessment
<p>Goal 1 Align the plan investments and policies with improving regional economic development and competitiveness.</p>	<p>Not Applicable. This goal is directed towards SCAG and does not apply to individual development projects such as the Project.</p>
<p>Goal 2 Maximize mobility and accessibility for all people and goods in the region.</p>	<p>No Conflict. Senate Bill 743 updates the way transportation impacts are evaluated in California for new development projects, with a focus on providing active transportation and reducing vehicle miles traveled. Under SB 743, providing active transportation infrastructure and promoting infill development near existing and future transit areas serves to reduce single occupancy vehicle use and reduce the amount of travel of people and goods in the region. The Project is located in a highly urbanized area with the City of Los Angeles within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area (TPA) as defined by SB 743.⁷ The Project would develop a total of 176 residential units and guest rooms, a new childcare facility, and Church administrative spaces in a location that is well-served by existing and future transit infrastructure. Specifically, the Project Site is located less than one-quarter mile (approximately 900 feet) from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. In addition, this intersection would be served by the Westwood/UCLA Station of Metro’s Purple Line Extension, which is anticipated to be operational in 2027. The Project would also include 27 short-term and 43 long-term bicycle parking spaces. As a result, the Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. Furthermore, the Project Site is adjacent to existing, office, institutional, entertainment, and neighborhood-serving commercial uses, including banks, theaters, churches, and other retail uses. Therefore, the location of the Project encourages mobility and accessibility for residents, employees, and visitors of the Project Site.</p> <p>Note that Goal 2 of the 2020-2045 RTP/SCS (“Improve mobility, accessibility, reliability, and travel safety for all people and goods”) is functionally equivalent to Goal 2 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.</p>

⁷ HQTA’s are identified frequent transit service or major transit stations located in communities throughout the SCAG region. A TPA is defined as the area within one-half mile from a major transit stop. A major transit stop is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

<p>Goal 3 Ensure travel safety and reliability for all people and goods in the region.</p>	<p>No Conflict. Although this Goal is not directly applicable to individual development projects, the Project would support this goal by improving public safety infrastructure near the Project Site. The Project would provide new building identification, accent lighting, wayfinding lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security. Pedestrian access to the Project would be distinct from vehicle driveways and pedestrian and automobile traffic would not be mixed to ensure pedestrian safety. In addition, the Project would be subject to the site plan review requirements of the City of Los Angeles and undergo review by the Los Angeles Department of Building and Safety (LADBS), Los Angeles Department of Transportation, and the Los Angeles Fire Department to ensure that all access roads, driveways and parking areas would not create a design hazard to local roadways.</p> <p>Note that Goal 2 of the 2020-2045 RTP/SCS (“Improve mobility, accessibility, reliability, and travel safety for all people and goods”) is functionally equivalent to Goal 3 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.</p>
<p>Goal 4 Preserve and ensure a sustainable regional transportation system.</p>	<p>Not Applicable. This Goal is directed towards SCAG and not does apply to individual development projects such as the Project. Nevertheless, the Project would minimize impacts on the existing roadway system by placing new senior housing as well as neighborhood-serving institutional uses near transit, and by providing bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. Moreover, due to its proximity to numerous existing bus lines as well as future rail service, the Project also encourages increased rail and bus usage, thereby contributing to increased ridership and sustainability of the City’s multimodal transportation system in the region.</p> <p>Furthermore, as discussed in the Project’s Transportation Impact Study (provided as Appendix K to this SCEA), the Project would not create a significant impact at any of the study intersections or roadways, nor would it create a significant impact at any CMP monitoring location.</p> <p>Note that Goal 3 of the 2020-2045 RTP/SCS (“Enhance the preservation, security, and resilience of the regional transportation system”) is functionally equivalent to Goal 4 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.</p>
<p>Goal 5 Maximize the productivity of our transportation system.</p>	<p>No Conflict. Although this goal is not directly applicable to individual development projects, the Project would support this goal by encouraging the use of public transit, walking and bicycling. The Project would locate new residential and institutional uses on the Project Site in close proximity to numerous bus lines as well as the future Westwood/UCLA Station of Metro’s Purple Line Extension currently scheduled to open in 2027. Thus, the Project would contribute to the productivity and use of the regional transportation system by providing housing and job opportunities near transit. Moreover, as discussed in the Project’s Transportation Impact Study (provided as</p>

	<p>Appendix K to this SCEA), the Project would not create a significant impact at any of the study intersections or roadways, nor would it create a significant impact at any CMP monitoring location.</p> <p>Note that Goal 4 of the 2020-2045 RTP/SCS (“Increase person and goods movement and travel choices within the transportation system”) is functionally equivalent to Goal 5 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.</p>
<p>Goal 6 Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</p>	<p>No Conflict. The Project would be consistent with this goal by facilitating the use of alternative modes of transportation, which would aid in reducing vehicle trips. As discussed, the Project Site is in close proximity to a variety of public transit options. The Project would also include a minimum of 70 bicycle parking spaces (27 short-term and 43 long-term), and would encourage pedestrian activity by locating new residential and institutional uses on the Project Site within walking distance of existing office, institutional, entertainment, and neighborhood-serving commercial uses in the area. Furthermore, as noted in Section 2, <i>Project Description</i>, the Project would include pedestrian-friendly landscaping and design, a new street level private plaza, and streetscape improvements that would enliven the pedestrian experience. These design features would encourage walking, biking, and the use of public transportation, which would help to reduce vehicle miles traveled, thereby improving the air quality in the region.</p> <p>Note that Goal 5 of the 2020-2045 RTP/SCS (“Reduce greenhouse gas emissions and improve air quality”) is functionally equivalent to Goal 6 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.</p>
<p>Goal 7 Actively encourage and create incentives for energy efficiency, where possible.</p>	<p>No Conflict. Although this goal refers to the creation of incentives, the Project would indirectly support this goal. As discussed under Goal 6, above, the Project would reduce passenger vehicle trips by encouraging alternative modes of transportation, including walking, biking, and the use of public transit, which would lead to a reduction in transportation energy demand. In addition, as discussed in detail in Section 4, Sustainable Communities Environmental Analysis, Subsection 6, Energy, the Project would be required to comply with the California Building Energy Efficiency Standards Code (Title 24, Part 6) and the California Green Building Standards Code (Title 24, Part 11). The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, building designs meeting LEED Silver sustainability ratings, cool roof systems, use of Energy Star appliances, allocated rooftop space for solar panels, and provision of electric vehicle (EV) charging stations and EV-ready infrastructure in the Project’s parking garage.</p> <p>Note that Goal 5 of the 2020-2045 RTP/SCS (“Reduce greenhouse gas emissions and improve air quality”) is functionally equivalent to Goal 7 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.</p>

<p>Goal 8 Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p>No Conflict. As stated above, the Project Site is located within a HQTA as defined by SCAG and a TPA as defined by SB 743. Specifically, the Project Site is located approximately 900 feet from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. In addition, this intersection would be served by the Westwood/UCLA Station of Metro's Purple Line Extension which is currently scheduled to open in 2027. As a result, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. In addition, the Project Site is adjacent to existing office, institutional, entertainment, and neighborhood-serving commercial uses, including banks, theaters, churches, and other retail uses. Therefore, the Project would encourage the use of transit and active transportation.</p> <p>Note that Goal 6 of the 2020-2045 RTP/SCS ("Support healthy and equitable communities") is functionally equivalent to Goal 8 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.</p>
<p>Goal 9 Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.</p>	<p>Not Applicable. This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required for individual projects such as the Project.</p>
<p>Guiding Policy 1 Transportation investments shall be based on SCAG's adopted regional Performance Indicators.</p>	<p>Not Applicable. This policy is directed towards SCAG in allocating transportation investments. This policy does not apply to individual development projects; therefore, no further analysis is required.</p>
<p>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.</p>	<p>Not Applicable. This policy is directed towards SCAG in allocating transportation system funding. This policy does not apply to individual development projects; therefore, no further analysis is required.</p>
<p>Guiding Policy 3 RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.</p>	<p>Not Applicable. This policy is directed towards SCAG and does not apply directly to the Project. Nevertheless, the Project would develop new residential and institutional uses within a HQTA as defined by SCAG and a TPA as defined by SB 743, which would support the smart growth initiatives for the region.</p>
<p>Guiding Policy 4 Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.</p>	<p>Not Applicable. This policy is directed towards transportation investment by SCAG and does not apply to individual projects such as the Project. However, the Project Site's location within a HQTA and a TPA promotes the use of public transit and pedestrian and bicycle activity.</p>
<p>Guiding Policy 5 HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.</p>	<p>Not Applicable. This policy is directed towards transportation investment by SCAG to support HOV gap closures and does not apply to individual development projects.</p>
<p>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.</p>	<p>Not Applicable. This policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles and does not apply to individual development projects. Nevertheless, the Project is located within a HQTA and a TPA, and would encourage the use of alternative modes of transportation that would reduce single-occupancy vehicle use.</p>

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 and does not apply to the Project.
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 does not apply to the Project.
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. Nevertheless, the Project is an infill development within a HQTAs and TPA and would provide residential units and institutional uses in a highly urbanized area within the City of Los Angeles. The Project Site is also in the 'Urban' LDC as designated by SCAG.
Land Use Policy 2 Structure the plan on a three-tiered system of centers development. ⁸	Not Applicable. This Land Use Policy is directed towards SCAG and does not apply to the Project.
Land Use Policy 3 Develop "Complete Communities."	<p>No Conflict. SCAG describes the development of "complete communities" as providing 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.⁹</p> <p>As stated above, the Project would develop residential units and institutional uses in a transit-rich area. The Project Site's proximity to public transit, services, retail stores, and employment opportunities promotes the use of alternative modes of transportation, including walking, cycling, and the use of public transit. Therefore, the Project would be consistent with the SCAG's goals of increasing mixed uses in transit-rich areas near services, retail, and employment opportunities to reduce vehicle miles traveled.</p>
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 does not apply to individual projects.
Land Use Policy 5 Plan for additional housing and jobs near transit.	No Conflict. As stated above, the Project would develop residential and institutional uses in a HQTAs and TPA. Specifically, the Project Site is located less than one-quarter mile (approximately 900 feet) from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during

⁸ 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.

⁹ SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).

	the morning and afternoon peak commute periods. In addition, this intersection would be served by the Westwood/UCLA Station of Metro's Purple Line Extension, which is anticipated to be operation in 2027. As a result, the Project would provide residents, employees and visitors with convenient access to public transit. The Project would construct a total of 176 senior residential units and guest rooms and provide employment opportunities at the Eldercare Facility and Childcare Facility. Therefore, the Project would support this policy by providing housing and jobs near transit.
Land Use Policy 6 Plan for changing demand in types of housing.	No Conflict. The Project would develop 176 new senior independent and assisted living housing units to help meet the increased demand for additional senior housing in the City of Los Angeles. Therefore, the Project is consistent with this policy.
Land Use Policy 7 Continue to protect stable, existing single-family areas.	No Conflict. The Project's Eldercare Facility would be located within the portion of the Project Site that is zoned for high-density residential uses, while the Education Center would be located on the southern portion of the Site that is zoned for single-family residential uses. Institutional uses would be allowed on the southern portion of the Project Site pursuant to the approval of a CUP. The southern portion of the Project Site is currently improved with a single-family residence and a surface parking lot, both of which would be removed to allow for development of the Project. The removal of one single-family residence is unlikely to negatively impact the stability of the single-family residential areas located south and east of the Project Site. The proposed lower scale and intensity of the development on the southern portion of the Project Site would assist with the protection of the existing nearby single-family areas.
Land Use Policy 8 Ensure adequate access to open space and preservation of habitat.	Not Applicable. This policy is directed towards SCAG and does not directly apply to the Project. Nevertheless, the Project is located within an urbanized area within the City. Development of the Project would not remove any existing open space areas or habitat, since the Project Site is fully developed. The Project would provide approximately 9,909 square feet of landscaped space and new trees would be provided in conformance with the LAMC and City policies.
Land Use Policy 9 Incorporate local input and feedback on future growth.	Not Applicable. This Land Use Policy is directed towards SCAG and does not apply to the Project.
<i>Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016 ,and 2020-2045 RTP/SCS, September 2020.</i>	

Consistency with Criterion #2: The Project contains at least 50 percent residential use, based on total building square footage.

The Project would construct two new buildings on the Project Site which would contain a total floor area of 196,283 square feet (consisting of 19,703 square feet of non-residential uses within the proposed Education Center, and 176,580 square feet of residential uses within the proposed Eldercare Facility). Accordingly, the Project's residential floor area would comprise nearly 90

percent of the Project's new building square footage, and the Project would be consistent with this Criterion.¹⁰

Consistency with Criterion #3: The Project includes a minimum net density of at least 20 dwelling units per acre.

The overall Project Site is approximately 1.62 acres. The Project includes 53 dwelling units and 123 guest rooms in the proposed Eldercare Facility, resulting in an overall residential density of approximately 32 units per acre (if only dwelling units are considered) or over 108 units per acre (if both dwelling units and guest rooms are considered). Accordingly, the Project would be consistent with this Criterion.

Consistency with Criterion #4: The Project Site is located within one-half mile of a major transit stop or high-quality transit corridor included in the RTP/SCS.

A major transit stop is defined in PRC Section 21064.3 as “[a] site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods”. Furthermore, pursuant to PRC Section 21155(b), it also includes major transit stops that are included in the applicable regional transportation plan. A high-quality transit corridor is defined in PRC Section 21155(b) as “[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.” The City defines peak hours as between 6 a.m. and 9 a.m. and between 3 p.m. and 7 p.m.¹¹

The Project Site is located on Wilshire Boulevard, and is approximately 900 feet east of the intersection of Wilshire and Westwood Boulevards. This intersection will be served by the Westwood/UCLA Station of Metro’s Purple Line Extension, which is a project that is included in both the 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS, and which is expected to be operational in 2027.¹² Therefore, the future Westwood/UCLA Station would qualify as a major transit stop.¹³ Since the Project Site is located within 0.5 mile of a major transit stop, it is not required to further demonstrate its proximity to intersecting bus routes or high-quality transit corridors that provide bus service intervals of 15 minutes or less. Notwithstanding, the Project Site is also within a high quality transit corridor since it is located on Wilshire Boulevard, which is served by the Metro Rapid 720 bus line that provides service intervals of less than 15 minutes during peak commute hours (see Appendix N to this SCEA for transit headway analyses). In addition, the intersection of Wilshire and Westwood Boulevards is currently served by at least two intersecting major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods (see Appendix N to this SCEA). Since the Project Site is located within the required distance from a planned rail station, a high-quality transit corridor, and an intersection of

¹⁰ The Church’s existing Sanctuary would be retained and contains approximately 2,580 square feet of floor area. With the inclusion of the Sanctuary’s existing floor area, the Project’s residential floor area is nearly 89 percent of the total proposed floor area for the Site.

¹¹ City of Los Angeles Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines) <https://planning.lacity.org/ordinances/docs/toc/TOCGuidelines.pdf>.

¹² SCAG, 2016-2040 RTP/SCS, p. 90.

¹³ Specifically, the proposed Westwood/UCLA Station will be located under Wilshire Blvd between Veteran Avenue and Westwood Boulevard, with its main station entrance located to the west of Gayley Avenue, which is approximately 1,500 feet/0.30 mile from the Project Site. See <https://www.metro.net/projects/purple-section3/>, accessed September 31, 2020.

two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods, the Project is consistent with this Criterion.

3.3 INCORPORATION OF APPLICABLE MITIGATION FROM PRIOR EIRS

PRC Section 21151.2(a) requires that a Transit Priority Project (TPP) incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. As a new predominantly residential project to be developed at an urban infill site that is within a SCAG-identified HQTAs (as well as a TPA), the most relevant prior EIR for the Project is the SCAG 2016 RTP/SCS Program EIR, which was adopted in April 2016.

The Mitigation Monitoring and Reporting Program (MMRP) for the 2016-2040 RTP/SCS Program EIR does not include project level mitigation measures that are required to be incorporated into the Project. However, the MMRP does provide 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.

As noted in Section 1, Introduction, on September 3, 2020, SCAG's Regional Council approved and adopted the 2020–2045 RTP/SCS, which is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles (including the 2016-2040 RTP/SCS) to increase mobility options and achieve a more sustainable growth pattern. The MMRP prepared for the 2020 RTP/SCS Program EIR includes similar program-level mitigation measures as the 2016-2040 RTP/SCS Program EIR, with minor textual and organizational edits. These minor changes do not fundamentally alter the intent or applicability of SCAG's mitigation measure when the lead agency determines that a TPP has the potential for significant effects. Because the MMRPs prepared for the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS are functionally equivalent, this SCEA primarily utilizes the 2016-2040 RTP/SCS Program EIR project-level mitigation measures, with references and additions as applicable.

The City has complied with PRC Section 21151.2 by reviewing all of the mitigation measures in the 2016-2040 RTP/SCS Program EIR MMRP and determined their potential applicability to the Project. This applicability analysis is presented in Section 4 of this SCEA for each environmental issue identified under Appendix G. For each such mitigation measure, the City determined whether to use: (1) the MMRP's mitigation measure; (2) an equally effective City mitigation measure; (3) federal, state, regional, or City regulation; or (4) no mitigation, as there was no potential for a significant environmental effect. A summary of the City's applicability analysis is found in Table 3-2 below.

**Table 3-2
Project Consistency with SCAG 2016-2040 RTP/SCS Mitigation Measures**

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
<p><u>Aesthetics</u> AES-1: Potential to have a substantial adverse effect on a scenic vista.</p>	<p>MM-AES-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to “break up” large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that clear-cutting is not evident. • Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. • Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain. 	<p>This mitigation measure is not applicable to the Project. PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority Projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill Projects within TPAs pursuant to CEQA.”¹⁴</p> <p>PRC Section 21099 applies to the Project as the project is a mixed-use residential project on an infill site within a transit priority area (see Section 3, SCEA Criteria). The Project Site would be located approximately 900 feet from the intersection of Wilshire Boulevard and Westwood Boulevard, which qualifies as a major transit stop due to the intersection of multiple high-frequency bus lines, as well as the future Westwood/UCLA Station of Metro’s Purple Line Extension rail line which is anticipated to be operational in 2027. Since the Project’s potential aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, this Mitigation Measure is not applicable to the Project.</p>
<p><u>Aesthetics</u> AES-3: Potential to substantially degrade the existing visual character or quality</p>	<p>MM-AES-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should</p>	<p>This mitigation measure is not applicable to the Project. PRC Section 21099, enacted by SB 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.”</p>

¹⁴ City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>. Accessed June 20, 2019.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
<p>of the site and its surroundings.</p>	<p>consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. Design projects consistent with design guidelines of applicable general plans. Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. 	<p>PRC Section 21099 applies to the Project as the project is a mixed-use residential project on an infill site within a transit priority area (see Section 3, SCEA Criteria). Since the Project’s potential aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, this Mitigation Measure is not applicable to the Project.</p>
<p><u>Aesthetics</u> AES-4: Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.</p> <p>Potential to result in shade and shadow impacts.</p>	<p>MM-AES-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or minimizing the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations. Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. Use unidirectional lighting to avoid light trespass onto adjacent properties. 	<p>This mitigation measure is not applicable to the Project. PRC Section 21099, enacted by SB 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.”</p> <p>PRC Section 21099 applies to the Project as the project is a mixed-use residential project on an infill site within a transit priority area (see Section 3, SCEA Criteria). Since the Project’s potential aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, this Mitigation Measure is not applicable to the Project.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<ul style="list-style-type: none"> • Design exterior lighting to confine illumination to the Project Site, and/or to areas which do not include light-sensitive uses. • Provide structural and/or vegetative screening from light-sensitive uses. • Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. 	
<p><u>Agriculture and Forestry</u> AF-1: Potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.</p>	<p>MM-AF-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> • For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act). • Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. • Maintain and expand agricultural land protections such as urban growth boundaries. <p>Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the conservation easement agreements are upheld. The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking)</p> <p>“A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permittees who need to satisfy legal requirements and compensate for the</p>	<p>This mitigation measure is not applicable to the Project. No Prime, Unique, or Farmland of Statewide Importance exists on or adjacent to the Project Site. Further, no farmland or agricultural activity exists on or in the vicinity of the Project Site. Although the property west of the Project Site is zoned for agricultural use, this is inconsistent with the current use of the site, as the property has been utilized as a cemetery and memorial park for decades. Moreover, the westerly adjacent property is designated by the City of Los Angeles as a Historic-Cultural Monument, which would preclude any future agricultural uses.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<p>environmental impacts of developmental projects.</p> <p>A privately owned conservation or mitigation bank is a free-market enterprise that:</p> <ul style="list-style-type: none"> • Offers landowners economic incentives to protect natural resources; • Saves permittees time and money by providing them with the certainty of pre-approved compensation lands; • Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values; • Provides for long-term protection and management of habitat. <p>A publicly owned conservation or mitigation bank:</p> <ul style="list-style-type: none"> • Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance.” <p>In 2013, the University of California published an article entitled “Reforms could boost conservation banking by landowners” that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs.</p> <ul style="list-style-type: none"> • Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. • Include underpasses and overpasses at reasonable intervals to maintain property access. • Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. • Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible. • Contact the California Department of Conservation and each county’s Agricultural Commissioner’s office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts. 	
<p><u>Agriculture and Forestry</u> AF-2: Potential to conflict with existing zoning for agricultural use, or a Williamson Act</p>	<p>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</p>	<p>This mitigation measure is not applicable to the Project. The Project Site is not zoned for agricultural production, there is no farmland at the Project Site, and there are no Williamson Act Contracts in effect for the Project Site.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
contract.	<p>compliance with the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the California Land Conservation Act of 1965, the Farmland Security Zone Act, and county and city zoning codes, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> • Project relocation or corridor realignment to avoid lands in Williamson Act contracts. • Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. • Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable. 	
<p><u>Agriculture and Forestry</u> AF-4: Potential to result in the loss of forest land or conversion of forest land to non-forest use.</p>	<p>MM AF-1(b) and MM GHG-3(b)</p>	<p>This mitigation measure is not applicable to the Project. The Project Site is currently developed with urban uses, not forest use; therefore, no forest land would be lost or converted to non-forest uses.</p>
<p><u>Agriculture and Forestry</u> AF-5: Potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.</p>	<p>MM AF-1(b) and MM GHG-3(b)</p>	<p>This mitigation measure is not applicable to the Project. The Project Site is currently fully developed with urban uses, is not used for any agricultural uses, and is not designated as forest land; therefore, no agricultural use or forest land would be converted.</p>
<p><u>Air Quality</u> AIR-2: Potential to violate any air quality standard or</p>	<p>MM-AIR-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to</p>	<p>The Project incorporates regulatory compliance which is consistent with this measure. As discussed in detail in Section 4, Subsection 3, Air Quality, of this SCEA, based on the air quality modeling prepared for the Project, the Project would not result in</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
<p>contribute substantially to an existing or projected air quality violation.</p>	<p>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.</p> <p>CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions:</p> <ul style="list-style-type: none"> • Minimize land disturbance. • Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. • Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. • Cover trucks when hauling dirt. • Stabilize the surface of dirt piles if not removed immediately. • Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. • Minimize unnecessary vehicular and machinery activities. • Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. • On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. • Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used as an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. • Ensure that all construction equipment is properly tuned and maintained. • Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. • Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators. • Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite 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. 	<p>ROG, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} emissions that would exceed SCAQMD regional thresholds or localized significance thresholds (LSTs). No project level impacts have been identified and therefore, no mitigation measures are required. Notwithstanding, the City requires compliance with existing regulatory measures, such as those listed below and discussed in detail in Section 4, Subsection 3, Air Quality, of this SCEA, which have been identified by CARB, the SCAQMD, and other agencies, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible, and which are consistent with those regulatory measures identified by MM-AIR-2(b):</p> <ul style="list-style-type: none"> • SCAQMD Rule 403 compliance. <ul style="list-style-type: none"> ○ All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. ○ The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. ○ All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. ○ All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. ○ All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. ○ General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. ○ Trucks having no current hauling activity shall not idle but be turned off. • SCAQMD Rule 1113, which regulates the VOC content of architectural coatings to minimize emissions of ROG_s during construction activities • SCAQMD Rule 401 and CARB's In-use Off-road Diesel-Fueled Fleets Regulation. • The Project would be required to comply with Section 2485 of Title 13 of the California Code of Regulations, which states that the idling of all diesel-fueled commercial vehicles

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<ul style="list-style-type: none"> • As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. • Implement EPA's National Clean Diesel Program. • Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible. • On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity. • If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines. • Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines • Convert part of the construction truck fleet to natural gas. • Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts • Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road) • Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas • Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation • Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation • Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary • Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes. Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit. • Prohibit diesel idling within 1,000 feet of sensitive receptors. 	<p>(weighing over 10,000 pounds) during construction shall be limited to five minutes at any location, and</p> <ul style="list-style-type: none"> • Rule 1121, which specifies NO_x emission limits from residential type, natural-gas fired water heaters. <p>Therefore, through compliance with applicable air quality regulatory requirements that are consistent with the measures identified by MM-AIR-2(b), the Project would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts would be less than significant.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<ul style="list-style-type: none"> • Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • The engine size of construction equipment shall be the minimum practical size. • Catalytic converters shall be installed on gasoline-powered equipment. • Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit. • Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite. • Use new or rebuilt equipment. • Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be checked by an ASE-certified mechanic and determined to be running in proper condition before it is operated. • Use low rolling resistance tires on long haul class 8 tractor-trailers. • Suspend all construction activities that generate air pollutant emissions during air alerts. • Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines. 	
<p><u>Air Quality</u> AIR-4: Expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially.</p>	<p>MM-AIR-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects would be located. Where the Lead Agency has identified that a project has the potential to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s), or other comparable measures, to reduce cancer risk pursuant to the Air Toxics "Hot Spots" Act of 1987 (AB2588), as applicable and feasible. Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB's strategy includes the following elements:</p> <ul style="list-style-type: none"> • Set technology forcing new engine standards. • Reduce emissions from the in-use fleet. • Require clean fuels, and reduce petroleum dependency. • Work with US EPA to reduce emissions from federal and state sources. • Pursue long-term advanced technology measures <p>Proposed new transportation-related SIP measures include: On-Road Sources</p>	<p>This mitigation measure is not applicable to the Project. The Project is not a RTP/SCS transportation project. Moreover, as discussed in detail in Section 4, Subsection 3, Air Quality, of this SCEA, the Project would not expose sensitive receptors to substantial pollutant concentrations during construction or operation phases of the Project, and therefore, impacts would be less than significant.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<ul style="list-style-type: none"> 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 o Ship Auxiliary Engine Cold Ironing and Other Clean Technology Cleaner Ship Main Engines and Fuel o Port Truck Modernization o Accelerated Introduction of Cleaner Line-Haul Locomotives o Clean Up Existing Commercial Harbor Craft o Limited idling of diesel-powered trucks o Consolidated truck trips and improve traffic flow o Late model engines, Low emission diesel products, engine retrofit technology o Alternative fuels for on-road vehicles <p>Off-Road Sources</p> <ul style="list-style-type: none"> o Cleaner Construction and Other Equipment o Cleaner In-Use Off-Road Equipment o Agricultural Equipment Fleet Modernization o New Emission Standards for Recreational Boats o Off-Road Recreational Vehicle Expanded Emission Standards 	
<p><u>Biological Resources</u> BIO-1: Potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.</p>	<p>MM-BIO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Sections 7, 9, and 10(a) of the federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, as applicable and feasible. Additional compliance should adhere to applicable implementing regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California Department of Fish and Wildlife. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. • Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act 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 	<p>This mitigation measure is not applicable to the Project. The Project Site is an infill site located in an urban area that is currently fully developed with urban uses. Moreover, as discussed in Section 4, Subsection 4, Biological Resources, of this SCEA, 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. Therefore, measures included in MM-BIO-1(b) are not applicable to the Project and no impact would occur.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<p>wild of federally and state-listed endangered species including the bald eagle:</p> <ul style="list-style-type: none"> ○ Avoidance strategies ○ Contribution of in-lieu fees ○ Use of mitigation bank credits ○ Funding of research and recovery efforts ○ Habitat restoration ○ Conservation easements ○ Permanent dedication of habitat ○ Other comparable measures <ul style="list-style-type: none"> ● Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. ● Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. ● Appoint an Environmental Inspector to monitor implementation of mitigation measures. ● Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. ● Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance. ● Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. 	
<p><u>Biological Resources</u> BIO-2: Potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations; or by the California Department of Fish and Wildlife or U.S.</p>	<p>MM-BIO-1(b)</p> <p>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</p>	<p>These mitigation measures are not applicable to the Project. As discussed in Section 4, Subsection 4, Biological Resources, of this SCEA, the Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with existing buildings and lacks native biological habitats, including riparian and wetland features. Therefore, the Project Site does not contain any wetland features, critical or riparian 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, measures included in MM-BIO-1(b) and MM-BIO-2(b) are not applicable to the Project and no impact would occur.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
Fish and Wildlife Service	<p>applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act. • Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully-Protected Species afforded protection pursuant to the State Fish and Game Code. • Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds. • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season. • Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities. • Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the <i>Manual of California Vegetation</i>, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate. • Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. • Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats. • Install fencing and/or mark sensitive habitat to be avoided during construction activities. • Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of 	

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<p>temporary disturbance within the project area.</p> <ul style="list-style-type: none"> • 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. 	
<p><u>Biological Resources</u> BIO-3: Potential to have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.</p>	<p>MM-BIO-1(b) and MM-BIO-2(b)</p> <p>MM-BIO-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 404 of the Clean Water Act and regulations of the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. • Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB). Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE’s Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration’s performance standard of “no net loss of wetlands” a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to 	<p>These mitigation measures are not applicable to the Project. As discussed in Section 4, Subsection 4, Biological Resources, of this SCEA, the Project Site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act. Therefore, the measures included in MM-BIO-1(b), MM-BIO-2(b), and MM-BIO-3(b) are not applicable to the Project, and no impact would occur.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<p>the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:</p> <ul style="list-style-type: none"> ○ Permittee-responsible mitigation ○ Contribution of in-lieu fees ○ Use of mitigation bank credits <ul style="list-style-type: none"> ● 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. 	
<p><u>Biological Resources</u> BIO-4: Potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites</p>	<p>MM-BIO-1(b), MM-BIO-2(b), and MM-BIO-3(b).</p> <p>MM-BIO-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and policies of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> ● Consult with the USFWS, 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 	<p>The Project incorporates regulatory compliance which is equal to or more effective than the mitigation measures. The Project Site is a fully developed urban infill site located in a developed urbanized area and does not provide habitat for sensitive biological resources. As discussed in Section 4, Subsection 4, Biological Resources of this SCEA, there are no Significant Ecological Areas (SEAs) within the vicinity of the Project Site. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area.</p> <p>In addition, as analyzed in Section 4, Subsection 4, Biological Resources of this SCEA, the Project would require the removal of 33 of the 34 existing on- and off-site trees. Some of the trees to be removed could potentially provide nesting habitat for a variety of bird species that are afforded protection under the federal Migratory Bird Treaty Act (MBTA – 16 United State Code Section 703-711). However, the Project would be required to comply with the provisions of the MBTA and California Fish and Game Code (CFGC), which would reduce impacts to nesting birds to a less than significant level by ensuring that any active bird nests on or adjacent to the Project Site are not disturbed by Project construction. Specifically, in accordance with the MBTA, tree removal activities would take place outside of the nesting season (February 15–September 15). To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. With compliance with the MBTA, which would be equal to or more effective than relevant measures of MM-BIO-4(b), Project impacts would be less than significant.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<p>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.</p> <ul style="list-style-type: none"> • Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. • Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDDB by a qualified biologist to determine the risk of habitat fragmentation. • Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). • Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible. • Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern. • Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. • Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas. • Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: <ul style="list-style-type: none"> ○ Wildlife movement buffer zones 	

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<ul style="list-style-type: none"> ○ Corridor realignment ○ Appropriately spaced breaks in center barriers ○ Stream rerouting ○ Culverts ○ Creation of artificial movement corridors such as freeway under- or overpasses ○ Other comparable measures ● Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. ● Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously 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. 	
<p><u>Biological Resources</u> BIO-5: Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	<p>MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), and MM-BIO-4(b).</p> <p>MM-BIO-5(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> ● Consult with the 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 	<p>The Project incorporates regulatory compliance which is equal to or more effective than the mitigation measures.</p> <p>As analyzed in Section 4, Subsection 4, Biological Resources of this SCEA, there are currently 31 trees located on the Project Site, including one Western Sycamore which is a protected tree species under the City’s Protected Tree Ordinance (Ordinance No. 177,404), and three City Southern Magnolia street trees located off site. All trees would be removed as part of the Project, except for one of the Southern Magnolia street trees. The Western Sycamore tree to be removed would be replaced at a new planting ratio of 4:1 in conformance with the requirements of the City’s Protected Tree Ordinance and the current policies of the City’s Urban Forestry Division. In addition, the two street trees to be removed would be replaced with four new street trees, in accordance with the requirements of the City’s Urban Forestry policies. Through required compliance with the City’s Protected Tree Ordinance and associated Urban Forestry policies, which are equal to or more effective than MM-BIO-5(b), the Project would not conflict with local policies protecting biological resources, and impacts would be less than significant.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	<p>collected native species.</p> <ul style="list-style-type: none"> • 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, filling, 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. • 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: <ul style="list-style-type: none"> ○ 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 	

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<p><u>Biological Resources</u> BIO-6: Potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>	<p>MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), and MM-BIO-5(b).</p> <p>MM-BIO-6(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. • Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in MM-BIO-1(b), where applicable. 	<p>This mitigation measure is not applicable to the Project. As analyzed in Section 4, Subsection 4, Biological Resources of this SCEA, the Project Site is not subject to provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not located within or adjacent to an existing Significant Ecological Area. Therefore, the measures included in MM-BIO-1(b) through MM-BIO-6(b) are not applicable to the Project, and no impact would occur.</p>
<p><u>Cultural Resources</u> CUL-1: Potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features.</p>	<p>MM-CUL-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. 	<p>The Project incorporates a Project-specific mitigation measure which is equal to or more effective than this mitigation measure. As discussed in detail in Section 4, Subsection 7, Geology and Soils, while the Project Site has not been identified as a location containing unique paleontological resources, MM-GEO-1 is capable of avoiding or reducing potential significant impacts on unique paleontological resources or sites that may be inadvertently encountered during Project construction:</p> <ul style="list-style-type: none"> • MM-GEO-1 (Paleontological): A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be determined by the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist

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	<ul style="list-style-type: none"> ● 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: <ul style="list-style-type: none"> ○ All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. ○ Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP. ○ Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. ○ Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas. ● Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance. ● Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. 	<p>shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum.</p> <p>Implementation of MM-GEO-1 would ensure that Project impacts to paleontological resources would be reduced to less than significant. Furthermore, as analyzed in Section 4, Subsection 7, Geology and Soils, of this SCEA, there are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or in the Project vicinity, and no impacts to unique geologic features would occur.</p>
<p><u>Cultural Resources</u> CUL-2: Potential to cause a substantial adverse change in the significance of a historical resource, including tribal cultural resources, as defined in CEQA Guidelines Section 15064.5.</p>	<p>MM-CUL-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> ● Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified. 	<p>The Project incorporates Project-specific mitigation measures which are equal to or more effective than this mitigation measure.</p> <p>Pursuant to CEQA Guidelines Section 15064.5, a Historic Resources Assessment was prepared for the Project, which satisfies the requirements set forth in MM-CUL-2(b) to identify if previously evaluated or previously unknown historical resources are present.</p> <p>Specifically, the Historic Resources Assessment Report (included as Appendix E and is also discussed in Section 4, Subsection 5, Cultural Resources of this SCEA) concluded the existing Church Sanctuary building is considered a historical resource; however, the Project does not propose any alterations to the principal elevation or side elevations of the Sanctuary, with the exception of the removal of a wood trellis and office addition that was constructed on the side elevation in 2006, which would</p>

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	<ul style="list-style-type: none"> • Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. • Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: <ul style="list-style-type: none"> ○ Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. ○ Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. • Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource. • Consult with the Native American Heritage Commission to determine whether known sacred site 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 	<p>not impair the Sanctuary’s historic status. Moreover, the Sanctuary would be protected during Project construction (including excavation of the Project’s subterranean garage) through implementation of a vibration damage protection plan, which is included as an appendix to the Noise and Vibration Technical Report (see Appendix J to this SCEA).</p> <p>Accordingly, the Historic Resources Assessment concluded that following Project implementation, the Sanctuary would retain sufficient integrity to continue to convey its historic associations and would remain eligible as a historic resource, and no direct impacts to on-site historic resources would occur.</p> <p>In addition to the on-site Sanctuary, the Project would be constructed adjacent to the Pierce Brothers Westwood Village Memorial Park and Mortuary, which is a City-designated Historic-Cultural Monument. Due to the close proximity of Project construction to the mortuary, vibration levels from construction equipment have the potential to result in damage to the structures, thus potentially affecting its integrity and eligibility as a historic resource. However, incorporation of the mitigation measures included in Section 4, Subsection 13, Noise, would reduce impacts to less than significant.</p> <ul style="list-style-type: none"> • MM-N-8: Construction activities that produce vibration, such as demolition, excavation, and earthmoving, shall be sequenced so that vibration sources within 100 feet of the mortuary structures at Pierce Brothers Westwood Village Memorial Park and Mortuary do not operate simultaneously. • MM-N-9: Pre-construction surveys shall be performed to document the conditions at the boundary of the mortuary at Pierce Brothers Westwood Village Memorial Park and Mortuary. A structural monitoring program shall be implemented and recorded during construction to ensure that groundborne vibration levels at the boundary of the Project Site adjacent to the mortuary do not exceed 0.12 inches per second peak particle velocity (PPV). The performance standards of the structure monitoring plan shall include the following: <ul style="list-style-type: none"> ○ Documentation, consisting of video and/or photographic documentation of accessible and visible areas on the exterior of the building. ○ Prior to the start of construction, the applicant shall retain the services of a structural engineer to visit the Pierce Brothers Westwood Village Memorial Park and Mortuary to inspect and document the apparent physical condition of the building’s readily-visible features,

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	<p>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.</p> <ul style="list-style-type: none"> • Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources. 	<p>including but not limited to the building structure. In addition, the structural engineer shall establish baseline structural conditions of the building and prepare the shoring design.</p> <ul style="list-style-type: none"> ○ The applicant shall retain the services of a qualified acoustical engineer to review the proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Project’s western property line adjacent to the Pierce Brothers Westwood Village Memorial Park and Mortuary during the Project’s demolition and excavation phases during which heavy construction equipment (e.g., large bulldozer and drill rig) would be operating within 15 feet of the affected buildings. ○ The vibration monitoring system shall measure and continuously store the PPV in inches per second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.07 inch per second (PPV) and a regulatory level of 0.12 inch per second (PPV). The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels. ○ In the event that the warning level of 0.07 inch per second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques. ○ In the event that the regulatory level of 0.12 inch per second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the Pierce Brothers Westwood Village Memorial Park and Mortuary and visually inspect the building for any damage. Results of the inspection shall be logged. The contractor shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level of 0.07 inch per second (PPV). Construction activities may then restart. ○ In the event that damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant. ○ The structure-monitoring program shall be submitted to the Department of Building and Safety and received into

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		<p>the case file for the associated discretionary action permitting the Project prior to initiating any construction activities.</p> <ul style="list-style-type: none"> • MM-N-10: Construction activities shall utilize rubber-tired equipment in place of steel-track equipment whenever feasible. <p>Incorporation of MM-N-8 through MM-N-10 are equal to or more effective than the measures listed in MM-CUL-2(b) as they are based on Project-specific analysis. Impacts would be less than significant.</p>
<p><u>Cultural Resources</u> CUL-3: Potential to cause a substantial adverse change in the significance of an archaeological resource, including tribal cultural resources, pursuant to CEQA Guidelines Section 15064.5.</p>	<p>MM-CUL-2(b). (Listed above)</p>	<p>The Project incorporates a Project-specific mitigation measure which is equal to or more effective than this mitigation measure.</p> <p>As discussed in Section 4, Subsection 5, Cultural Resources, of this SCEA, a Historic Resources Assessment was prepared for the Project and surrounding properties and included results from a record search regarding existing cultural resources, including archeological resources. The Historic Resources Assessment concluded that no archaeological resources have been identified on or in proximity to the Project Site. Because no resources have been identified, no specific avoidance measures are warranted. However, to address the potential for encountering previously unidentified resources during ground-disturbing activities, MM-CR-1 has been prepared, which provides a process for evaluating and, as necessary, avoiding impacts to any identified resources.</p> <ul style="list-style-type: none"> • MM-CR-1 (Archaeological): A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

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<p><u>Cultural Resources</u> CUL-4: Potential to disturb human remains, including those interred outside of formal cemeteries, including Native American Sacred Sites.</p>	<p>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:</p> <ul style="list-style-type: none"> ● In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. ● If any discovered remains are of Native American origin: <ul style="list-style-type: none"> ○ Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. ○ If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: <ul style="list-style-type: none"> ▪ 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. 	<p>MM-CR-1 is equal to or more effective than relevant measures under MM-CUL-2(b) as it is based on Project-specific analysis, and with its incorporation, potential impacts to archaeological resources will be less than significant.</p> <p>The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure.</p> <p>If human remains are encountered during construction of the Project, 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 Section 5097.98. If the Coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains to be those of Native American, he or she shall consult with the native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may require mediation by NAHC.</p> <p>With compliance with these regulatory requirements, which are equal to or more effective than MM-CUL-4(b), impacts would be less than significant.</p>

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<p><u>Energy</u> EN-2: Potential to increase residential energy consumption use.</p>	<p>MM-EN-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including: <ul style="list-style-type: none"> ○ Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ○ Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. ○ Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight. ○ Incorporate passive environmental control systems that account for the characteristics of the natural environment. ○ Use high-efficiency lighting and cooking devices. ○ Incorporate passive solar design. ○ Use high-reflectivity building materials and multiple glazing. ○ 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. 	<p>The Project incorporates regulatory compliance and a project design feature which are equal to or more effective than this mitigation measure. As discussed in detail in Section 4, Subsection 8 Greenhouse Gas Emissions, of this SCEA, the Project would comply with existing City and State regulatory requirements (e.g., Green Building Code and CALGreen). In addition, the Project would include the following project design feature that the City has determined is equal to or more effective than MM-EN-2(b).</p> <ul style="list-style-type: none"> • PDF-GHG-1: LEED Silver Equivalence The design of the new buildings shall incorporate features of the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED® Silver or equivalent green building standards. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Silver Equivalence shall include, but are not limited to the following: <ul style="list-style-type: none"> ○ Use of Energy Star–labeled products and appliances. ○ Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use. ○ Water-efficient plantings with drought-tolerant species; ○ Fenestration (the arrangement of windows, doors, and other openings) designed for solar orientation; and ○ Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking. <p>Compliance with regulatory requirements and implementation of PDF-GHG-1, which are equal to or more effective than MM-EN-2(b), would ensure that impacts would be less than significant.</p>
<p><u>Energy</u> EN-3: Potential to increase building energy consumption in anticipated development.</p>	<p>MM-EN-2(b). (listed above)</p>	<p>See discussion under EN-2.</p>
<p><u>Geology and Soils</u> GEO-1: Potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving (i)</p>	<p>MM-GEO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety</p>	<p>The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. The Project would substantially conform to MM-GEO-1(b) because it would be required to comply with the existing seismic design provisions regulations associated with the City of Los Angeles Building Code, which incorporates the Uniform Building Code (UBC) and California Building Code (CBC). In addition, pursuant to the City’s existing building regulations, the Project would be required to provide a final design-level geotechnical report,</p>

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<p>rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground-failure, including liquefaction; and (iv) landslides.</p>	<p>Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault. • Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC. • Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards. • Consistent with the CBC and local regulatory agencies with oversight of 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, 	<p>subject to LADBS review and approval prior to the issuance of grading permits for the Project. This final geotechnical report would include the primary recommendations of the preliminary Geotechnical Investigation, included as Appendix F of this SCEA, and the final design-level recommendations from that report would be enforced by LADBS for the construction of the Project. Compliance with these regulatory requirements would be equal to or more effective than MM GEO-1(b), with respect to avoiding and/or reducing the potential for the Project to result in the exposure of people and infrastructure to the effects of surface faults, strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides.</p>

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<p>Geology and Soils GEO-2: Potential to result in substantial soil erosion or the loss of topsoil.</p>	<p>subsidence, liquefaction, or collapse wherever feasible.</p> <p>MM-GEO-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: <ul style="list-style-type: none"> ○ File a Notice of Intent (NOI) with the SWRCB. ○ Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. ○ Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project. ○ After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB. • Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. • Consistent with the CBC and local regulatory agencies with oversight of 	<p>The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. The Project would substantially conform to MM-GEO-2(b) because it would be required to comply with existing State and City regulations that would be equal to or more effective than MM GEO-2(b), with respective to reducing impacts related to soil erosion and loss of top soil. Specifically, LAMC Section 91.7006.7 includes requirements regarding import and export of earth material; Section 91.7010 includes regulations pertaining to excavations; Section 91.7011 includes requirements for fill materials; Section 91.7013 includes regulations pertaining to erosion control and drainage devices; Section 91.7014 includes general construction requirements, as well as requirements regarding flood and mudflow protection; and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils. In addition, Section 91.1803 includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. Since the applicant would be required to prepare a Grading Plan that would comply with LADBS Grading Division’s Landform Grading Manual Guidelines and implement appropriate erosion control and drainage devices per the Los Angeles Municipal Code Section 91.7013, the Project would not result in substantial erosion or loss of topsoil and impacts would be less than significant.</p> <p>In addition, as described in Section 4, Subsection 10, Hydrology and Water Quality, of this SCEA, compliance with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, municipal separate storm sewer system (MS4) permit, Clean Water Act (CWA), City stormwater ordinances), which would be equal to or more effective than MM-GEO-2(b) would reduce the Project’s potential impacts related to surface runoff and water quality to less than significant levels.</p>

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	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.	
<p><u>Geology</u> GEO-3: Potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.</p>	<p>MM-GEO-1(b).</p>	<p>The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. As concluded in the Geotechnical Report prepared for the Project (see Appendix F to this SCEA), the Project would not contain uses or activities that would exacerbate existing environmental conditions. In addition, the Project would be required to comply with the City's existing building permit regulations. Specifically, as discussed under GEO-1 and GEO-2 above, the Project would be required to provide a final design-level geotechnical report for LADBS review and approval prior to the issuance of grading permits for the Project, which would include the primary recommendations of the preliminary Geotechnical Investigation. The final design-level recommendations from that report would be enforced by LADBS for the construction of the Project. Compliance with these regulatory requirements would be equal to or more effective than MM GEO-1(b), with respect to avoiding and/or reducing the potential for the Project to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.</p>
<p><u>Geology</u> GEO-4: Potential to be located on expansive soil, as defined in Table 18-1- B of the Uniform Building Code (1994), creating substantial risks to life or property.</p>	<p>MM-GEO-1(b).</p>	<p>The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. As stated in the Geotechnical Report prepared for the Project (Appendix F of this SCEA), the Project Site's subsurface materials generally consist of moist, medium dense to very dense silty sand, sand, and sandy silt in a very stiff to hard condition. These soils, due to their low moisture content, do not typically have high expansion potential. Regardless, the Project would be required to adhere to applicable provisions of the City's Building Code, which would address any potential for expansion. Compliance with these regulatory requirements would be equal to or more effective than MM GEO-1(b), with respect to avoiding and/or reducing the potential for the Project to be located on expansive soil and would ensure that impacts would be less than significant.</p>
<p>GHG Cumulative Impacts</p>	<p>MM-GHG-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of</p>	<p>The Project incorporates regulatory compliance and a project design feature which are equal to or more effective than this measure. The Project must comply with existing City and State regulatory requirements (e.g., Green Building Code and CALGreen) that the City has determined are equal to or more effective than MM-GHG-3(b) in avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.</p>

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	<p>greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region as set forth below, or through comparable measures identified by Lead Agency:</p> <ul style="list-style-type: none"> • Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. • Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. • Off-site measures to mitigate a project's emissions. • Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: <ul style="list-style-type: none"> ○ Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction; ○ Use alternative (non-petroleum based) fuels; ○ Deployment of zero- and/or near zero emission technologies as defined by CARB; ○ Use lighting systems that are energy efficient, such as LED technology; ○ Use the minimum feasible amount of GHG-emitting construction materials that is feasible; ○ Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production; ○ Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse; ○ Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy; ○ Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption; ○ Use lighter-colored pavement where feasible; ○ Recycle construction debris to maximum extent feasible; ○ Protect and plant shade trees in or near construction projects where feasible; and ○ Solicit bids that include concepts listed above. • Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying 	<p>In addition to City and State requirements, the Project would also incorporate the following project design feature that is capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the GHG emissions:</p> <ul style="list-style-type: none"> • PDF-GHG-1: LEED Silver Equivalence. The design of the new buildings shall incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED® Silver or equivalent green building standards. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Silver equivalence shall include, but are not limited to the following: <ul style="list-style-type: none"> ○ Use of Energy Star–labeled products and appliances. ○ Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use. ○ Water-efficient plantings with drought-tolerant species; ○ Fenestration (the arrangement of windows, doors, and other openings) designed for solar orientation; and ○ Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking. <p>As discussed in Section 4, Subsection 8, Greenhouse Gas Emissions, of this SCEA, the Project would be consistent with state, regional, and City of Los Angeles GHG emission reduction goals and objectives set forth in the 2008 Climate Change Scoping Plan and 2014 Scoping Plan Update, the 2017 Climate Change Scoping Plan, the 2016– 2040 RTP/SCS, and the Sustainable City pLAN/Green New Deal. Compliance with regulatory requirements and implementation of PDF-GHG-1, which are equal to or more effective than MM-GHG-3(b), would ensure that the Project's GHG impacts would be less than significant and the Project's incremental contribution to GHG emissions would not be cumulatively considerable.</p>

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	<p>capacity on transit and rail vehicles.</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ 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. 	
<p><u>Hazards and Hazardous Materials</u> HAZ-1: Potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p>	<p>MM-HAZ-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. • Where the construction or operation of projects involves the transport of 	<p>The Project incorporates regulatory compliance which is consistent with the relevant measures listed in this mitigation measure. The Project would be required to comply with the applicable state and federal laws for the transport, use or disposal of hazardous materials. As discussed in Section 4, Subsection 9, Hazards and Hazardous Materials, of this SCEA, the Project would not involve the routine transport, use, or disposal of significant amounts of hazardous materials other than modest amounts of gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment and vehicles, and minor amounts of materials used in connection with maintenance and landscaping during operation. The transport, use, and storage of hazardous materials during the construction and operation of the Project would be conducted in accordance with applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Through compliance with these regulatory</p>

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	<p>hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. ○ The location of such hazardous materials. ○ An emergency response plan including employee training information. ○ A plan that describes the manner in which these materials are handled, transported and disposed. • Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects. • Follow manufacturer’s recommendations on use, storage, and disposal of chemical products used in construction. • Avoid overtopping construction equipment fuel gas tanks. • During routine maintenance of construction equipment, properly contain and remove grease and oils. • Properly dispose of discarded containers of fuels and other chemicals. 	<p>requirements, which are equal to or more effective than MM-HAZ-1(b), potential impacts would be less than significant.</p>
<p><u>Hazards and Hazardous Materials</u> HAZ-2: Potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release</p>	<p>MM-HAZ-1(b).(listed above)</p>	<p>The Project incorporates regulatory compliance and project design features which are equal to or more effective than this mitigation measure. The Project would be required to comply with the with applicable state and federal laws for the for the transport, use, and storage of hazardous materials. Construction and operation of the Project would be conducted in accordance with applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22.</p>

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<p>of hazardous materials into the environment.</p>		<p>In addition, as analyzed in Section 4, Subsection 9, Hazards and Hazardous Materials, of this SCEA, a Phase I Environmental Site Assessment (ESA) was prepared for the Site (see Appendix G to this SCEA), which determined that the Project Site has not historically been used for an industrial purpose, or as a gasoline station, motor repair facility, commercial printing facility, dry cleaners, photo developing laboratory, junkyard or landfill, waste treatment facility or recycling facility. No chemical use is present at the Project Site and there are no known spills or releases, known environmental cleanups, or obvious indicators of environmental contamination.</p> <p>Furthermore, any removal of potentially existing asbestos containing materials (ACM) or lead-based paint (LBP) from the Project Site's existing structures as part of their demolition would be performed in accordance with all applicable and federal regulations and the Project would implement PDFs HAZ-1 and HAZ-2, listed below, thereby reducing any potential impact to less-than-significant.</p> <p>PDF-HAZ-1: Lead-Based Paint. Prior to any renovations or demolition activities, any suspected lead-based paint shall be sampled. Any identified lead-based paint located within buildings scheduled for renovation or demolition, or noted to be damaged, shall be abated by a licensed lead-based paint abatement contractor, and disposed of according to all state and local regulations.</p> <p>PDF-HAZ-2: Asbestos. Prior to the initiation of demolition work, areas of the on-site structures proposed for removal shall be sampled as part of an asbestos survey in compliance with the National Emission Standards for Hazardous Air Pollutants. If asbestos is found in any building, asbestos-related work, including demolition, involving 100 square feet or more of ACM shall be performed by a licensed asbestos abatement contractor under the supervision of a certified asbestos consultant. Asbestos shall be removed and disposed of in compliance with applicable State laws. Regardless of whether asbestos is identified in the building, prior to demolition of the existing structures the South Coast Air Quality Management District (SCAQMD) shall be notified and a SCAQMD Asbestos Demolition and Renovation Compliance Checklist shall be submitted to both the SCAQMD and the City of Los Angeles.</p> <p>Because the Project Site is within a methane zone, prior to the issuance of a building permit, the Project Site would be required to comply with all applicable methane regulations, including hiring</p>

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		<p>a qualified engineer, as defined in City Ordinance No. 175,790 and Section 91.7102 of the LAMC, to 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.</p> <p>With implementation of the regulatory compliance and PDFs described above, which are equal to or more effective than MM-HAZ-1(b), the Project's potential impacts would be less than significant.</p>
<p><u>Hazards and Hazardous Materials</u> HAZ-3: Potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school.</p>	<p>MM-HAZ-1(b). (listed above)</p>	<p>This mitigation measure is not applicable to the Project. There are no schools within 0.25 miles of the site. Notwithstanding, as described above under HAZ-1 and HAZ-2, the Project would be required to comply with the applicable state and federal laws for the transport, use, and storage of hazardous materials. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. All such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools.</p>
<p><u>Hazards and Hazardous Materials</u> HAZ-4: Potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.</p>	<p>MM-HAZ-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Clean-up Act, and the Uniform Building Code, and County and City building standards, and all applicable federal, state, and local laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. • Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the Project Site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, 	<p>The Project incorporates regulatory compliance and project design features which are equal to or more effective than this mitigation measure. As discussed in detail in Section 4, Subsection 9, Hazards and Hazardous Materials, of this SCEA, the Project Site is not currently listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 according to the Phase I ESA prepared for the Project (see Appendix G to this SCEA), and Project would not result in development on a site with known hazardous materials. Furthermore, as discussed under HAZ-1 and HAZ-2, the Project would be required to comply with the applicable state and federal regulation and would implement PDFs HAZ-1 and HAZ-2 pertaining to ACMs and LBPs. These PDFs and regulatory compliance would be equal to or more effective than MM-HAZ-4(b), and impacts will be less than significant.</p>

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

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	<p>and vapor intrusion into the building.</p> <ul style="list-style-type: none"> • 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 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. 	
<p><u>Hazards and Hazardous Materials</u> HAZ-7: Potential to impair implementation</p>	<p>MM-TRA-5(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead</p>	<p>The Project incorporates regulatory compliance and project design features which are equal to or more effective this mitigation measure.</p>

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<p>of or physically interfere with an adopted emergency response plan or emergency evacuation plan.</p>	<p>Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: <ul style="list-style-type: none"> ○ Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. ○ Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. ○ Scheduling of truck trips outside of peak morning and evening commute hours. ○ Limiting of lane closures during peak hours to the extent possible. ○ Usage of haul routes minimizing truck traffic on local roadways to the extent possible. ○ Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. ○ Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. ○ Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. ○ Storage of construction materials only in designated areas. • Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and 	<p>As described in Section 4, Subsection 9, Hazards and Hazardous Materials, of this SCEA, the Project includes a project design feature (PDF-T-1) that would require the development of a Construction Traffic Management Plan to ensure that adequate emergency access is maintained and that through-access for drivers, including emergency personnel, along all roads would be continuously provided during construction. In addition, future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Site access and circulation plans would be subject to review and approval by the Los Angeles Fire Department (LAFD). Through regulatory compliance and with implementation of this project design feature, which is equal to or more effective than MM-TRA-5(b), potential impacts related to the impairment or interference with an adopted emergency response plan or emergency evacuation plan would be less than significant.</p>

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	<p>c) restoration of utilities.</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities. ○ Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. <p>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.</p>	
<p><u>Hazards and Hazardous Materials</u> HAZ-8: Potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.</p>	<p>MM-HAZ-8(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers. • Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, and public outreach. • Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, 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- 	<p>This mitigation measure is not applicable to the Project. The Project Site is located in an urbanized area and there are no wildlands in the vicinity. Furthermore, the Project would be required to adhere to fire code requirements set by the LAMC. Therefore, measures included in MM-HAZ-8(b) are not applicable to the Project and no impact would occur.</p>

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	<p>rooted non-natives.</p> <ul style="list-style-type: none"> • 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. 	
<p><u>Hydrology and Water Quality</u> HYD-1: Potential to violate any water quality standards or waste discharge requirements.</p>	<p>MM-HYD-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. • Implement Best Management Practices to reduce the peak stormwater runoff from the Project Site to the maximum extent practicable. • Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. • Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. • Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. • Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: <ul style="list-style-type: none"> ○ U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the 	<p>The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. The Project would be required to comply with existing water quality standards as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB), which the City has determined are equal to or more effective than MM-HYD-1(b). As analyzed in Section 4, Subsection 10, Hydrology and Water Quality, of this SCEA, compliance with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) would reduce the Project's potential impacts related to surface runoff and water quality to a less than significant level. The Project would also be required to comply with the National Pollutant Discharge Elimination System (NPDES) permitting system and the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance Nos. 172,176 and 173,494) to ensure pollutant loads from the Project Site are minimized for downstream receiving waters. These ordinances contain requirements for construction activities and operation of Projects to integrate Low Impact Design (LID) practices and standards for stormwater pollution mitigation, and maximize open, green, and pervious space on all Projects consistent with the City's landscape ordinance and other related requirements in the City's Development Best Management Practices (BMPs) Handbook. Conformance would be ensured during the City's building plan review and approval process for individual construction Projects. Through this regulatory compliance, which is equal to or more effective than MM-HYD-1(b), impacts would be less than significant.</p>

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	<p>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.</p> <ul style="list-style-type: none"> ○ Regional Water Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above. ○ California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW. <ul style="list-style-type: none"> ● 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. ● 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 	

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	<p>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.</p> <ul style="list-style-type: none"> • 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. 	
<p><u>Hydrology and Water Quality</u> HYD-2: Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).</p>	<p>MM-HYD-2(b): Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms with federal, state, regional, and local standards for sustainable management of groundwater basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, 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. 	<p>The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. The Project would be required to comply with applicable regulations and requirements related to groundwater. As discussed in Section 4, Subsection 10, Hydrology and Water Quality, of this SCEA, temporary dewatering operations may be required during construction of the Project based on the historic high groundwater level of 25 feet below the existing grade. Any dewatering of groundwater would comply with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. In addition, if a permanent subdrain system is required for the basement or the footings, the system would be installed in accordance with the recommendations contained in the final design-level geotechnical report required by the LAMC and enforced by LADBS. Groundwater withdrawal required during potential periods of high groundwater levels would not substantially deplete groundwater supplies at or near the Project Site. In addition, the Project Site is currently developed and provides little groundwater recharge potential. Therefore, the construction of the Project would not substantially impact the amount of groundwater recharge occurring on-site and would not result in a lowering of the local groundwater table. Through regulatory compliance, which is equal to or more effective than MM-HYD-2(b), impacts would be less than significant.</p>
<p><u>Hydrology and Water Quality</u> HYD-3: Potential to substantially alter the</p>	<p>MM-HYD-1(b). (listed above)</p>	<p>The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. The Project construction would comply with applicable NPDES and City requirements including those requiring the preparation of a</p>

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existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site.		Project-specific Stormwater Pollution Prevention Plan (SWPPP). Further, pursuant to the City's LID Ordinance, the Project would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's BMPs. Through meeting these requirements, the Project would comply with City of Los Angeles' stormwater capture and reuse criteria and LID design standards. Through regulatory compliance, which is equal to or more effective than MM-HYD-1(b), impacts would be less than significant.
<u>Hydrology and Water Quality</u> HYD-4: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site.	MM-HYD-1(b). (listed above)	The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. The City of Los Angeles's Low Impact Development (LID) design standards, the City of Los Angeles Development Best Management Practices Handbook, the Los Angeles Regional Water Quality Control Board requirements, and the National Pollution Discharge Elimination System permit requirements. Because there are no waterbodies within or near the Project Site, flooding is not expected to occur on- or off-site. Through regulatory compliance, which is equal to or more effective than MM-HYD-1(b), impacts would be less than significant.
<u>Hydrology and Water Quality</u> HYD-5: Potential to substantially create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff.	MM-HYD-1(b). (listed above)	The Project incorporates regulatory compliance which is equal to or more effective than this mitigation measure. The Project would be required to comply with regulatory requirements contained in LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. The Project would not substantially change the amount of impervious surface area on the Project Site, and Project compliance with applicable state, regional, and City policies and regulations including the NPDES General Construction Permit, NPDES Groundwater Discharge Permit, MS4 permit, CWA, City stormwater ordinances) would reduce the Project's potential impacts related to surface runoff to a less than significant level. Through regulatory compliance, which is equal to or more effective than MM-HYD-1(b), impacts would be less than significant.
<u>Hydrology and Water Quality</u> HYD-6: Potential to otherwise substantially degrade water quality.	MM-HYD-1(b). (listed above)	See discussion under HYD-1 .
<u>Hydrology and Water Quality</u>	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	This mitigation measure is not applicable to the Project. The Project Site is not located within a designated flood zone,

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<p>HYD-8: Potential to place within a 100-year flood hazard area structures that would impede or redirect flood flows.</p>	<p>reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program. • Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change. 	<p>according to the Federal Emergency Management Agency (FEMA) flood insurance rate map #06037C1590F (FEMA 2008).</p>
<p><u>Hydrology and Water Quality</u> HYD-9: Potential to expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.</p>	<p>MM-HYD-8(b).(listed above)</p>	<p>This mitigation measure is not applicable to the Project. As discussed above under HYD-8, the Project Site is not located within a 100-year flood hazard area, and the City’s General Plan Safety Element does not identify the Project Site as being located in a flood control basin. As discussed in Section 4, Subsection 10, Hydrology and Water Quality, of this SCEA, although the Site is not located in a potential flood area, it is located approximately 1,000 feet from a potential inundation area for the Stone Canyon Reservoir, which is approximately two miles northeast. The dam is continually monitored by various governmental agencies to prevent dam failure and to ensure that the dam is capable of withstanding the maximum potential earthquake for the site. In accordance with these regulations, Stone Canyon Dam is regularly inspected and meets safety regulations. Should dam failure occur despite safeguards, Los Angeles Department of Water and Power (LADWP) has emergency response plans in place to address dam failure and potential impacts. Because Stone Canyon Dam is regularly inspected and subject to regulatory oversight, emergency response plans are in place in case of dam failure, and the Project Site is not located within the potential inundation area, potential impacts from inundation due to dam failure would be less than significant.</p>
<p><u>Hydrology and Water Quality</u> HYD-10: Potential for inundation by seiche, tsunami, or mudflow.</p>	<p>MM-HYD-8(b). (listed above)</p>	<p>This mitigation measure is not applicable to the Project. As discussed in Section 4, Subsection 10, Hydrology and Water Quality, of this SCEA, the Project Site lies outside of a tsunami hazard area pursuant to the City’s General Plan Safety Element. In addition, the Project Site does not lie near a large body of water that could experience a seiche. Furthermore, as stated in the</p>

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		Geotechnical Report prepared for the Project (see Appendix F to this SCEA), the Project Site is not located in an area identified to have potential for seismic slope instability or in the path of any known or potential landslides. Therefore, the Project would not be vulnerable to mudflow. The Project would have no impacts related to inundation by seiche, tsunami, or mudflow.
<p><u>Land Use and Planning</u> LU-1: Potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</p>	<p>MM-LU-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> ● Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan. 	<p>This mitigation measure is not applicable to the Project. This mitigation measure is not applicable to the Project because the Project is consistent with the goals, objectives, and policies of the City's General Plan (including the Framework Element, the Housing Element, Conservation Element, and Mobility Plan 2035), the Westwood Community Plan, the Wilshire-Westwood Scenic Corridor Specific Plan, and the LAMC (including the City's ElderCare Ordinance). As discussed in detail in Section 4, Subsection 11, Land Use and Planning, of this SCEA, the Project would not conflict with the various goals, objectives, policies, or regulations of these plans that have been adopted for the purpose of avoiding or mitigating an environmental effect with approval of the discretionary entitlements, reviews, permits and approvals required to implement the Project. Therefore, the measures included in MM-LU-1(b) are not applicable to the Project, and impacts would be less than significant.</p>
<p><u>Land Use and Planning</u> LU-2: Potential to physically divide an established community.</p>	<p>MM-LU-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> ● Consider alignments within or adjacent to existing public rights-of-way. ● Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. ● Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). ● Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods. 	<p>This mitigation measure is not applicable to the Project. As described in Section 4, Subsection 11, Land Use and Planning, of this SCEA, the Project would be compatible with surrounding mixed residential and commercial uses and would not involve construction of any new infrastructure (such as a new road) that would divide the Project Site or surrounding area. Access to and circulation through the Project Site would continue to be maintained via driveways along Wilshire Boulevard and along Ashton Avenue. Therefore, the measures included in M-LU-2(b) are not applicable to the Project, and no impact would occur.</p>

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	<ul style="list-style-type: none"> • Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: <ul style="list-style-type: none"> ○ Alignment shifts to minimize the area affected. ○ Reduction of the proposed right-of-way take to minimize the overall area of impact. ○ Provisions for bicycle, pedestrian, and vehicle access across improved roadways. • Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project. • Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities. 	
<p><u>Land Use and Planning</u> LU-3: Potential to conflict with any applicable habitat conservation plan or natural community conservation plan.</p>	<p>MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), MM-BIO-5(b), and MM-BIO- 6(b).</p>	<p>These mitigation measures are not applicable to the Project, or the Project incorporates regulatory compliance which is equal to or more effective than these mitigation measures. As described above under BIO-1, BIO-2, BIO-3, and BIO-6, the Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not located within or adjacent to an existing Significant Ecological Area. No impact would occur.</p> <p>As described above under BIO-4 and BIO-5, the Project would comply with applicable regulations regarding protected and non-protected tree removals and replacements, as well as applicable provisions of the MBTA regarding potential disturbance of nesting birds. Through this regulatory compliance, which is equal to or more effective than MM-BIO-4(b) and MM-BIO-5(b), impacts would be less than significant.</p>
<p><u>Mineral Resources</u> MIN-1: Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.</p>	<p>MM-MIN-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies.</p> <p>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</p>	<p>This mitigation measure is not applicable to the Project. The Project Site is not located within the Los Angeles Downtown Oil Field, a Mineral Resource Zone 2 (MRZ-2) Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area. There are no known aggregate and mineral sources or locally important mineral resource recovery sites on or adjacent to the Project Site. The Project would not result in the loss of availability of a regionally-valuable mineral resource, therefore, the measures included in MM-MIN-1(b) are not applicable to the Project, and no impact would occur.</p>

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	<p>Lead Agency:</p> <ul style="list-style-type: none"> • Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. • Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures: <ul style="list-style-type: none"> ○ Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. ○ Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the Project Site. ○ Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. ○ Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of Project Sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources. 	
<p><u>Mineral Resources</u> MIN-2: Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.</p>	<p>MM-MIN-1(b).(listed above)</p>	<p>This mitigation measure is not applicable to the Project. No oil extraction operations and drilling or mining of mineral resources exist at the Project Site, nor is the Project Site within an area identified as a locally important mineral resource recovery site that has been delineated on a local general plan, specific plan or other land use plan. Therefore, the measures included in MM-MIN-1(b) are not applicable to the Project, and no impact would occur.</p>
<p><u>Noise</u> NOISE-1: Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.</p>	<p>MM-NOISE-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor’s Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such</p>	<p>The Project incorporates regulatory compliance, Project-specific mitigation measures, and project design features which are equal to or more effective than this mitigation measure.</p> <p><u>Construction Noise</u> As discussed in detail in Section 4, Subsection 13, Noise, of this SCEA, construction of the Project would comply with the permitted construction hours established by LAMC Section 41.40(a). However, as discussed in the Noise Analysis conducted for the Project (see Appendix J to this SCEA)</p>

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	<p>measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance. Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Designate an on-site construction complaint and enforcement manager for the project. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. 	<p>construction equipment noise levels during these permitted construction hours have the potential to exceed the applicable significance thresholds. Therefore, following Project-specific analysis of potential noise impacts and applicable mitigation strategies, MM-N-1 through MM-N-7, which are consistent with the noise reduction measures identified by MM-NOISE-1(b), but which have been developed based upon Project-specific factors, have been devised which would reduce construction noise to a less-than-significant level.</p> <ul style="list-style-type: none"> • MM-N-1. During Phase I, a temporary noise barrier and/or sound control curtains shall be installed along the perimeter of the Project Site. The barrier shall have a Sound Transmission Class rating of 29 or more, consist of K-rail with one-inch plywood fencing on top, at least 8 feet in height and not have any gaps or holes between the panels or at the bottom. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code. • MM-N-2. During Phase I, exhaust mufflers shall be used capable of reducing noise down to an average of 65 dBA at a distance of 50 feet on internal combustion engines for heavy-duty construction equipment. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. • MM-N-3. During Phase I, no more than five pieces of heavy-duty construction equipment powered by diesel engines shall operate concurrently. On average, such equipment shall be in operation mode no more than 45 minutes in an hour. • MM-N-4. During Phase II, a temporary noise barrier and/or sound control curtains shall be installed along the perimeter of the Project Site. The barrier shall have a Sound Transmission Class rating of 29 or more, consist of K-rail with one-inch plywood fencing on top, at least ten feet in height and not have any gaps or holes between the panels or at the bottom. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code. • MM-N-5. During Phase II, exhaust mufflers shall be used capable of reducing noise down to an average of 60 dBA at a distance of 50 feet on internal combustion engines for heavy-duty construction equipment. All equipment shall be

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	<ul style="list-style-type: none"> • 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. 	<p>properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.</p> <ul style="list-style-type: none"> • MM-N-6. During Phase II, no more than five pieces of heavy-duty construction equipment powered by diesel engines shall operate concurrently. On average, such equipment shall be in operation mode no more than 30 minutes in an hour. • MM-N-7. During both phases, the housing or enclosures for noise-producing construction equipment shall be soundproofed, where feasible. <p><u>Operational Noise</u></p> <p>During operation, the Project would be required to comply with the City's noise regulations, including LAMC Section 112.02 (regulating equipment noise levels such as HVAC systems). Additionally, as discussed in Section 4, Subsection 13, Noise, of this SCEA, the Noise Analysis conducted for the Project (see Appendix J to this SCEA), the Project would implement the following project design features that would ensure that operational noise impacts would be avoided or reduced to a less-than-significant level.</p> <ul style="list-style-type: none"> • PDF-N-1: Amplified Sound. No amplified music or public address system is to be utilized for the proposed preschool operations • PDF-N-2: Noise Shielding for Rooftop Equipment. Rooftop HVAC equipment shall be enclosed with absorptive materials that block any line-of-sight transmission of noise to adjacent properties. Pipes and duct work shall also be wrapped or treated to block transmission of sound. • PDF-N-3: Masonry Wall and Landscaping. A masonry wall and landscaping shall be installed along the southern property line of the Project Site. The masonry wall shall be at least five feet in height and block the line-of-sight between the proposed Childcare Facility and the existing homes on Wellworth Avenue. • PDF-N-4: Power During Construction. Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators shall be used during construction. <p>Through regulatory compliance as well as implementation of the above Project-specific mitigation and project design features, which are equal to or more effective than MM-NOISE-1(b), impacts would be less than significant.</p>

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<p>Noise</p> <p>NOISE-2: Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.</p>	<p>MM-NOISE-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Federal Transportation Authority and Caltrans guidance documents, county or city transportation commission, noise and vibration ordinances and general plan noise elements for the counties and cities where projects are undertaken and other health and safety regulations set forth by federal state, and local authorities that regulate vibration levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. • For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. • For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration. 	<p>The Project incorporates regulatory compliance, Project-specific mitigation measures, and project design features which are equal to or more effective than this mitigation measure.</p> <p>As discussed in detail in Section 4, Subsection 13, Noise, and following Project-specific analysis of potential vibration impacts and applicable mitigation strategies, the Project would incorporate the following mitigation measures that are equal to or more effective than MM-NOISE-2(b) in avoiding or reducing potential significant impacts to the Pierce Brothers Westwood Village Memorial Park and Mortuary from vibration during Project construction (see Appendix J to this SCEA):</p> <ul style="list-style-type: none"> • MM-N-8: Construction activities that produce vibration, such as demolition, excavation, and earthmoving, shall be sequenced so that vibration sources within 100 feet of the mortuary structures at Pierce Brothers Westwood Village Memorial Park and Mortuary do not operate simultaneously. • MM-N-9: Pre-construction surveys shall be performed to document the conditions at the boundary of the mortuary at Pierce Brothers Westwood Village Memorial Park and Mortuary. A structural monitoring program shall be implemented and recorded during construction to ensure that groundborne vibration levels at the boundary of the Project Site adjacent to the mortuary do not exceed 0.12 inches per second peak particle velocity (PPV). The performance standards of the structure monitoring plan shall include the following: <ul style="list-style-type: none"> ○ Documentation, consisting of video and/or photographic documentation of accessible and visible areas on the exterior of the building. ○ Prior to the start of construction, the applicant shall retain the services of a structural engineer to visit the Pierce Brothers Westwood Village Memorial Park and Mortuary to inspect and document the apparent physical condition of the building's readily-visible features, including but not limited to the building structure. In addition, the structural engineer shall establish baseline structural conditions of the building and prepare the shoring design. ○ The applicant shall retain the services of a qualified acoustical engineer to review the proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Project's western property line adjacent to the Pierce Brothers Westwood Village Memorial Park and Mortuary

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		<p>during the Project's demolition and excavation phases during which heavy construction equipment (e.g., large bulldozer and drill rig) would be operating within 15 feet of the affected buildings.</p> <ul style="list-style-type: none"> ○ The vibration monitoring system shall measure and continuously store the PPV in inches per second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.07 inch per second (PPV) and a regulatory level of 0.12 inch per second (PPV). The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels. ○ In the event that the warning level of 0.07 inch per second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques. ○ In the event that the regulatory level of 0.12 inch per second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the Pierce Brothers Westwood Village Memorial Park and Mortuary and visually inspect the building for any damage. Results of the inspection shall be logged. The contractor shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level of 0.07 inch per second (PPV). Construction activities may then restart. ○ In the event that damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant. ○ The structure-monitoring program shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the Project prior to initiating any construction activities. ● MM-N-10: Construction activities shall utilize rubber-tired equipment in place of steel-track equipment whenever feasible. <p>Through regulatory compliance as well as implementation of the above Project-specific mitigation and project design features, which are equal to or more effective than MM-NOISE-2(b), impacts would be less than significant.</p>

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<p><u>Noise</u> NOISE-3: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.</p>	<p>MM-NOISE-1(b). (listed above)</p>	<p>See discussion under NOISE-1.</p>
<p><u>Noise</u> NOISE-4: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.</p>	<p>MM-NOISE-1(b). (listed above)</p>	<p>See discussion under NOISE-1.</p>
<p><u>Population and Housing</u> PHE-1: Potential to induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).</p>	<p>MM-LU-1(b). (listed above)</p>	<p>This mitigation measure is not applicable to the Project. The Project would provide infill development within a currently developed urban setting and would not add new infrastructure beyond that required to connect the Project to existing utility lines, and adjacent roadways. Therefore, the Project would not open new areas to development; or promote development in an area not otherwise expected to be developed. In addition, as discussed in Section 4, Subsection 14, Population and Housing, of this SCEA, the level of population and employment growth associated with the Project would be negligible and would not exceed SCAG’s forecast. Therefore, the measures included in MM-LU-1(b) are not applicable to the Project.</p>
<p><u>Population and Housing</u> PHE-2: Potential to displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere.</p>	<p>MM-PHE-2(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction’s housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Evaluate alternate route alignments and transportation facilities that minimize 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 	<p>This mitigation measure is not applicable to the Project. The Project would require the demolition of one single-family residence located at 10812 West Ashton Avenue, which is owned by the Westwood Presbyterian Church. The Project proposes to construct an Eldercare Facility with 176 residential dwelling units and guest rooms. The Project would not displace substantial numbers of existing housing units. Therefore, the measures included in MM-PHE-2(b) are not applicable to the Project.</p>

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<p><u>Population and Housing</u></p> <p>PHE-3: Potential to displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.</p>	<p>construction.</p> <p>MM-PHE-2(b)</p>	<p>See discussion under PHE-2.</p>
<p><u>Public Services</u></p> <p>PS-1: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency response services.</p>	<p>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).</p> <p>MM-PS-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide sufficient structures and buildings to accommodate fire and emergency response, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> • Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements. • During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities. 	<p>The Project incorporates regulatory compliance which is consistent with the relevant measures listed in this mitigation measure.</p> <p>See above regarding AES-1, AES-3, AES-4, AF-1, AF-2, BIO-1 through BIO-3, CUL1 through CUL-4, GEO-1, and HYD-1, and below regarding USS-3, USS-4 and USS-6.</p> <p>As discussed in Section 4, Subsection 15, Public Services – Fire Protection, of this SCEA, existing fire protection facilities are capable of providing acceptable fire protection and emergency response services. Specifically, the Project would comply with the LAMC’s fire protection requirements, including the high-rise requirements contained in LAMC Section 57.4705.4 and LAFD Requirement No. 10, and the truck and engine company response distances required by LAMC 57.507.3.3. In addition, as part of the City’s building permit plan check process, LAFD would review the proposed site access, site plan, floor plans, and building plans prior to construction to ensure that required fire protection safety features, including hydrants, sprinklers and emergency access, comply with Fire Department requirements. Through compliance with these regulatory requirements, which are equal to or more effective than MM-PS-1(b), potential impacts pertaining to fire protection and emergency response services would be less than significant.</p>

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<p><u>Public Services</u> PS-2: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public protective security services.</p>	<p>MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM- USS-6(b).</p> <p>MM-PS-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including:</p> <ul style="list-style-type: none"> • Coordinate with public security agencies to ensure that there are adequate 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. 	<p>The Project incorporates regulatory compliance and a project design feature which are equal to or more effective this mitigation measure.</p> <p>See above regarding AES-1, AES-3, AES-4, AF-1, AF-2, BIO-1 through BIO-3, CUL1 through CUL-4, GEO-1, and HYD-1, and below regarding USS-3, USS-4 and USS-6.</p> <p>As discussed in Section 4, Subsection 15, Public Services – Police Protection, of this SCEA, existing facilities are capable of providing acceptable police protection response. Specifically, as discussed in Section 4, Subsection 15, Public Services – Police Protection, of this SCEA, the Project would include exterior lighting for security purposes, which would promote safety and reduce the demand for police services. The Project plans would be reviewed by the City to ensure design guidelines relative to security, semi-public and private spaces, are implemented, which may include but not be limited to access control to buildings, 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. In addition, the Project would incorporate project design feature PDF-PS-1, which would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction.</p> <ul style="list-style-type: none"> • PDF-PS-1: Security Measures. During construction, the Project Applicant or its successor shall implement appropriate temporary security measures, including, but not limited to, security fencing, low-level security lighting, and locked entry. During construction activities, the Project’s contractor will document the security measures being implemented. <p>Therefore, through compliance with existing City requirements regarding police protection services and implementation of PDF-PS-1, which are equal to or more effective than MM-PS-2(b), potential impacts pertaining to police services would be less than significant.</p>
<p><u>Public Services</u> PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically</p>	<p>MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MMCUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM- USS-6(b).</p> <p>MM-PS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or</p>	<p>The Project incorporates regulatory compliance and project design features which are equal to or more effective this mitigation measure.</p> <p>See above regarding AES-1, AES-3, AES-4, AF-1, AF-2, BIO-1 through BIO-3, CUL1 through CUL-4, GEO-1, and HYD-1, and below regarding USS-3, USS-4 and USS-6.</p>

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<p>altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services.</p>	<p>reducing the significant effects from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> • Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. • During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), 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. 	<p>As discussed in Section 4, Subsection 15, Public Services, of this SCEA, the Project applicant is required to pay state-mandated school impact fees prior to issuance of a building permit. Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "... is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." The Project would implement PDF-T-1 related to adequate and safe access to schools and comply with all regulatory compliance measures regarding payment of state-mandated fees, such that no Project specific impacts related to no new or physically altered school facilities would occur. Therefore, through compliance with existing regulations and implementation of PDF-T-1, which are equal to or more effective than relevant measures under MM-PS-3(b), potential impacts pertaining to schools would be less than significant.</p>
<p><u>Recreation</u> REC-1: Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p>	<p>MM-REC-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures capable of avoiding or reducing significant impacts on the use of existing neighborhood and regional parks or other recreational facilities to ensure compliance with county and city general plans and the Quimby Act, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, 	<p>The Project incorporates regulatory compliance which is consistent with the relevant measures listed in this mitigation measure.</p> <p>As discussed in Section 4, Subsection 15, Public Services – Parks and Recreation, of this SCEA, the Project would be required to include open space for its residents pursuant to LAMC Section 12.21 G, and would be responsible for paying park fees pursuant to Section 12.33 of the LAMC, the payment of which would mitigate potential park impacts due to increased demand. Therefore, through compliance with existing regulations which are equal to or more effective than relevant measures under MM-REC-1(b), potential impacts pertaining to recreation would be less than significant.</p>

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	<p>encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:</p> <ul style="list-style-type: none"> ○ Increasing the accessibility to natural areas for outdoor recreation. ○ Promoting infill development and redevelopment to revitalize existing communities. ○ Utilizing “green” development techniques. ○ Promoting water-efficient land use and development. ○ Encouraging multiple uses. ○ Including trail systems and trail segments in General Plan recreation standards. <ul style="list-style-type: none"> ● Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQT.A. ● Where construction or expansion of recreational facilities is included in the project or required to meet public park service ratios, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities. 	
<p><u>Recreation</u> REC-2: Potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</p>	<p>MM-REC-1(b). (listed above)</p>	<p>The Project incorporates regulatory compliance which is consistent with the relevant measures listed in this mitigation measure.</p> <p>See discussion under REC-1 above. In addition, the Project would include recreational spaces such as an outdoor garden, terraces, indoor activity and community rooms, a pool and lounge, a screening room, and outdoor play spaces to serve the recreational needs of the residents of the Eldercare Facility and the students at the Childcare Facility. As discussed in Section 4, Subsection 15, Public Services – Parks and Recreation, of this SCEA, impacts related to recreation facilities would be less than significant.</p>
<p><u>Transportation/Traffic</u> TRA-1: Potential to conflict with the established measures of effectiveness for the performance of the circulation system, by</p>	<p>MM-TRA-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures</p>	<p>This mitigation measure is not applicable to the Project. This mitigation measure was not incorporated because the Project would not conflict with the established measures of effectiveness for the performance of the circulation system. As discussed in detail in Section 4, Subsection 17, Transportation, of this SCEA, and in the Transportation Impact Study prepared by Linscott Law & Greenspan (see Appendix K to this SCEA), the Project would have a less-than-significant impact on the circulation system,</p>

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<p>increasing the daily VMT, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.</p>	<p>to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> ● Institute teleconferencing telecommute and/or flexible work hour programs to reduce unnecessary employee transportation. ● Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides. ● Provide a vanpool for employees. ● Fund capital improvement projects to accommodate future traffic demand in the area. ● Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: <ul style="list-style-type: none"> ○ Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement ○ Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document) ○ Signage and striping onsite to encourage bike safety ○ Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials ○ Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan. ○ Direct transit sales or subsidized transit passes ○ Guaranteed ride home program ○ Pre-tax commuter benefits (checks) ○ On-site car-sharing program (such as City Car Share, Zip Car, etc.) ○ On-site carpooling program ○ Distribution of information concerning alternative transportation options ○ Parking spaces sold/leased separately ○ Parking management strategies; including attendant/valet parking and shared parking spaces. ● Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas. ● Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible. 	<p>including intersections, CMP facilities, bicycle and pedestrian facilities, and public transit. In addition, the proposed Project is projected to have Household VMT per Capita of 6.0 and Work VMT per Employee of 2.9, which would not exceed the LADOT thresholds for Household VMT (7.4) and Work VMT (11.1) (see Appendix K-3 and K-4).</p> <p>Nonetheless, many of the Project characteristics support the intent of this mitigation measure to reduce VMT. Specifically, the Project is an infill mixed-use development in an urban area with proximity to public transit and existing office, institutional, entertainment, and neighborhood-serving commercial uses would provide encourage residents, employees, and visitors to utilize alternative modes of transportation. As previously discussed, the Project Site is served by multiple bus lines and the Westwood/UCLA station of Metro's Purple Line Extension rail line is currently under construction, with an anticipated opening date of 2027. In addition, the Project would be consistent with all applicable regulatory requirements for bicycle and electric vehicle parking. As discussed in detail in Section 4, Subsection 17, Transportation, of this SCEA, the Project would comply with the applicable plans, policies, and regulations governing the local circulatory network for all transportation modes. Therefore, the measures included in MM-TRA-1(b) are not applicable to the Project, and impacts would be less than significant.</p>

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	<ul style="list-style-type: none"> ● Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. ● Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work. ● Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs. ● Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles. ● Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions. ● Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. ● Purchase, or create incentives for purchasing, low or zero-emission vehicles. ● Create local "light vehicle" networks, such as neighborhood electric vehicle systems. ● Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles. ● Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles. ● Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives. ● Project Selection: <ul style="list-style-type: none"> ○ Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. ○ Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. ● Public Involvement: <ul style="list-style-type: none"> ○ 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 	

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	<p>underserved by transportation services.</p> <ul style="list-style-type: none"> ● Transit and Multimodal Impact Fees: <ul style="list-style-type: none"> ○ Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. ○ Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. ● System Monitoring: <ul style="list-style-type: none"> ○ Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency. ● Arterial Traffic Management: <ul style="list-style-type: none"> ○ Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. ● Signal Synchronization: <ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. ● Delivery Schedules: <ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ 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 	

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	<p>for bicycle and pedestrian facilities and access projects.</p> <ul style="list-style-type: none"> ● Bicycle Parking: <ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ Require new office developments with more than 50 employees to offer a Parking “Cash-out” Program to discourage private vehicle use. ● Pedestrian and Bicycle Promotion: <ul style="list-style-type: none"> ○ 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: 	

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<p>Transportation/Traffic TRA-2: Potential to conflict with an applicable congestion management program, including, but not limited to, VMT and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways.</p>	<ul style="list-style-type: none"> ○ 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. <p>MM-TRA-2(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions:</p> <ul style="list-style-type: none"> ● Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: <ul style="list-style-type: none"> ○ Advocate for a regional, market-based system to price or charge for auto trips during peak hours. ○ Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. ○ Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. ○ Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation. ○ Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. ● Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency: 	<p>This mitigation measure is not applicable to the Project. As described in detail in Section 4, Subsection 17, Transportation, of this SCEA, the Project would not exceed the LADOT thresholds for VMT and would be consistent with Section 15064.3 subdivision (b) of the CEQA Guidelines. Furthermore, as described above under TRA-1, the Project would not conflict with the established measures of effectiveness for the performance of the circulation system. In addition, MM-TRA-2(b)'s reference to a congestion management program (CMP) is no longer relevant, because consistent with California Government Code Section 65088.3, the County of Los Angeles has opted to be exempt from its former CMP, and CMP analysis is no longer included in City of Los Angeles environmental documents. Therefore, the Project would not conflict with an applicable CMP, the measures included in MM-TRA-2(b) are not applicable to the Project, and no impact would occur.</p>

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	<ul style="list-style-type: none"> ○ A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes. ○ Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. ○ Location of construction staging areas for materials, equipment, and vehicles at an approved location. ○ A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit. ○ Provision for accommodation of pedestrian flow. ○ As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces. ○ Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired at the project sponsor’s expense, within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor’s expense, before the issuance of a Certificate of Occupancy. ○ Any heavy equipment brought to the construction site shall be transported by truck, where feasible. ○ No materials or equipment shall be stored on the traveled roadway at any time. ○ Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion. ○ All equipment shall be equipped with mufflers. ○ Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors. ○ Promote “least polluting” ways to connect people and goods to their destinations. ● 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: 	

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	<ul style="list-style-type: none"> ○ Ensure transportation centers are multi-modal to allow transportation modes to intersect. ○ Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail. ○ To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges. ○ Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations. ○ Coordinate schedules and routes across service lines with neighboring transit authorities. ○ Support programs to provide “station cars” for short trips to and from transit nodes (e.g., neighborhood electric vehicles). ○ Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so. ○ Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles. ○ Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets. ○ Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible. ● Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> ○ Ensure transit stops and bus lanes are safe, convenient, clean and efficient. ○ Ensure transit stops have clearly marked street-level designation, and are accessible. ○ Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate. ○ Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one-half mile. ● Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> ○ Develop a Regional Pass system to reduce the number of different passes and tickets required of system users. ○ Implement “Smart Bus” technology, using GPS and electronic displays at transit stops to provide customers with “real-time” arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service). 	

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	<ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic. ○ Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access. ● Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> ○ Designate a certain percentage of parking spaces for ride-sharing vehicles. ○ Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles. ○ Provide a web site or message board for coordinating shared rides. ○ Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit. ○ Hire or designate a rideshare coordinator to develop and implement ridesharing programs. ● Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including: <ul style="list-style-type: none"> ○ Provide assistance to regional and local ridesharing organizations. ○ Advocate for legislation to maintain and expand incentives for employer ridesharing programs. ○ Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes. ○ Provide public recognition of effective programs through awards, top ten lists, and other mechanisms. ● Implement a “guaranteed ride home” program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program. ● Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations. ● Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers. ● Work with existing shuttle service providers to coordinate their services. ● Facilitate employment opportunities that minimize the need for private vehicle trips, including: <ul style="list-style-type: none"> ○ Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations. ○ Encourage telecommuting options with new and existing employers, through 	

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	<p>project review and incentives, as appropriate.</p> <ul style="list-style-type: none"> • Enforce state idling laws for commercial vehicles, including delivery and construction vehicles. • Organize events and workshops to promote GHG-reducing activities. • Implement a Parking Management Program to discourage private vehicle use, including: <ul style="list-style-type: none"> ○ Encouraging carpools and vanpools with preferential parking and a reduced parking fee. ○ Institute a parking cash-out program. ○ Renegotiate employee contracts, where possible, to eliminate parking subsidies. ○ Install on-street parking meters with fee structures designed to discourage private vehicle use. ○ Establish a parking fee for all single-occupant vehicles. • Work with school districts to improve pedestrian and bicycle to schools and restore school bus service • Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities. • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. • Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers. • Synchronize traffic signals to reduce congestion and air quality. • Work with community groups and business associations to organize and publicize walking tours and bicycle events. • Support legislative efforts to increase funding for local street repair. 	
<p><u>Transportation/Traffic</u> TRA-5: Potential to result in inadequate emergency access.</p>	<p>MM-TRA-5(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all 	<p>The Project incorporates regulatory compliance and project design features which are equal to or more effective than this mitigation measure.</p> <p>As discussed in Section 4, Subsection 17, Transportation, of this SCEA, the Project would include project design feature PDF-T-1, which requires preparation and approval of a detailed CSTMP with street/lane/sidewalk closure information, a detour plan, haul route(s), and a staging plan. This project design feature would be equal to or more effective than MM-TRA-5(b) to ensure that emergency vehicles would continue to have access to the Project Site during construction of the Project. During Project operation, emergency access to the Project Site would be provided by the existing street system. In addition, the Project would be designed and constructed in accordance with LAMC requirements, and would be reviewed by LAFD to ensure that adequate site access</p>

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	<p>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:</p> <ul style="list-style-type: none"> ○ Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. ○ Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. ○ Scheduling of truck trips outside of peak morning and evening commute hours. ○ Limiting of lane closures during peak hours to the extent possible. ○ Usage of haul routes minimizing truck traffic on local roadways to the extent possible. ○ Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. ○ Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. ○ Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. ○ Storage of construction materials only in designated areas. ● Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. ● Enhance emergency preparedness awareness among public agencies and with the public at large. ● Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: <ul style="list-style-type: none"> ○ Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities. ○ Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. 	<p>is maintained for emergency response vehicles during operation of the Project. Moreover, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lane of opposing traffic. Therefore, through regulatory compliance and implementation of project design features, which are equal to or more effective than MM-TRA-5(b), impacts would be less than significant.</p>

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	<ul style="list-style-type: none"> 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. 	
<p><u>Utilities and Service Systems</u> USS-3: Require or result in construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</p>	<p>MM-HYD-1(b). (listed above)</p> <p>MM-USS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on utilities and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8, and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan.</p> <p>Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant impacts on the use of existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities.</p>	<p>The Project incorporates regulatory compliance which are consistent with the relevant measures listed in this mitigation measure.</p> <p>See discussion of MM-HYD-1(b) above. The Project would be required to comply with regulatory requirements including the NPDES General Construction Permit, NPDES Groundwater Discharge Permit, MS4 permit, CWA, City stormwater ordinances. The City has determined that these regulatory measures are consistent with the measures listed under MM-USS-3(b). Compliance with these requirements would ensure that the Project would not require or result in construction of new storm water drainage facilities or expansion of existing facilities, and potential impacts would be less than significant. In addition, as discussed in Section 4, Subsection 10, Hydrology and Water Quality, of this SCEA, the Project would not substantially change the amount of impervious surface area on the Project Site, and would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems. Since no Project level impacts have been identified, and the Project incorporates measures consistent with measures identified by MM-HYD-1(b), impacts will be less than significant.</p>
<p><u>Utilities and Service Systems</u> USS-4: Have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements.</p>	<p>MM-USS-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter –Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and applicable County, City or other Local provisions. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. • Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. • Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. 	<p>This mitigation measure is not applicable to the Project. The Project would not require new or expanded entitlements for water supplies. As discussed in Section 4, Subsection 19, Utilities and Service Systems – Water, of this SCEA, based on the demand forecasts contained in LADWP’s 2015 Urban Water Management Plan, the Project’s anticipated net water demand would be accommodated for with existing and planned supplies. In addition, in accordance with project design feature GHG-PDF-1, the Project would be designed to be capable of meeting the standards of LEED® Silver equivalence, which includes water conservation features. Furthermore, the Project would be required to comply with all existing and future water conservation and sustainability measures regarding water use that the City implements. Therefore, although the measures included in MM-USS-4(b) are not applicable to the Project, the Project is consistent with applicable water reduction measures and impacts would be less than significant.</p>

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	<ul style="list-style-type: none"> • Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface. 	
<p><u>Utilities and Service Systems</u> USS-6: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.</p>	<p>MM-USS-6(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: <ul style="list-style-type: none"> ○ Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. ○ Inclusion of a waste management plan that promotes maximum C&D diversion. ○ Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). ○ Reuse of existing structure and shell in renovation projects. ○ Design for deconstruction without compromising safety. ○ Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components. ○ Development of indoor recycling program and space. ○ Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring 	<p>The Project incorporates regulatory compliance which is consistent with the relevant measures listed in this mitigation measure. The Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and impacts would be less than significant. As discussed in Section 4, Subsection 19, Utilities and Service Systems - Solid Waste, of this SCEA, the Project's handling of all debris and waste generated during construction would be subject to the State's requirements under AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project Site. In addition, during operation, the Project would comply with federal, state, and local statutes and regulations related to solid waste, such as AB 939, the Solid Waste Management Policy Plan, and the City's recycling program. Furthermore, there is adequate landfill capacity in the region to accommodate Project-generated waste during both construction and operation. Therefore, through regulatory compliance that is equal to or more effective than MM-TRA-5(b), impacts would be less than significant.</p>

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	<p>communities.</p> <ul style="list-style-type: none"> ○ 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. ○ Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. ○ Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. ○ Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. ○ Develop alternative waste management strategies such as composting, recycling, and conversion technologies. ○ Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. ○ Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). ○ Integrate reuse and recycling into residential industrial, institutional and commercial projects. ○ Provide recycling opportunities for residents, the public, and tenant businesses. ○ Provide education and publicity about reducing waste and available recycling services. ○ Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates. ○ Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services. 	
<p>Source: Southern California Association of Governments, Final 2016 2016-2040 RTP/SCS Program Environmental Impact Report, Mitigation Monitoring and Reporting Program, April 2016.</p>		

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