

Appendix J

As discussed in Section 5 of the Initial Study, Public Resources Code (PRC) Section 21155.2 requires that a Transit Priority Project (TPP) incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. To comply with PRC Section 21155.2, the City has reviewed all mitigation measures contained in the following EIRs: 1) Housing and Safety Element (shown on Table 5-1 of the Initial Study); 2) SCAG's 2020-2045 RTP/SCS (shown on Table 5-2 of the Initial Study); 3) Mobility Plan (shown on Table J-1, below); and 4) Wilshire Community Plan (discussion provided below Table J-1) and determined their applicability to the Project. The City's applicability determination is based on the analysis contained in Section 6, Environmental Impact Analysis, of the Initial Study.

**Table J-1
Mobility Plan EIR Mitigation Measures**

Mitigation Measures	Applicability to the Project
TRANSPORTATION, PARKING & SAFETY	
<p>T1 Los Angeles Department of Transportation (LADOT) will adjust traffic signal timing after the implementation of the proposed project (both along project routes and parallel roadways if traffic diversions have occurred as a result of the proposed project). This adjustment would be necessary, especially at the intersections where roadway striping would be modified. Signal timing adjustment could reduce traffic impacts at impacted intersections. (LADOT routinely makes traffic signal timing changes and signal optimization on an asneeded basis to accommodate the changes in traffic volumes to reduce congestion and delay in the City.</p>	<p>No Mitigation Required. This measure is directed at the City and not at individual projects. In addition, as discussed in the Transportation Assessment (included in Appendix G of this Initial Study), the Project is not expected to result in detrimental or undesirable effects on the intersections located immediately adjacent to the Project Site. Therefore, no Project-related physical or operational improvements at these intersections are warranted and no mitigation is required.</p>
<p>T2 The City shall implement appropriate Transportation Demand Management (TDM) measures in the City of Los Angeles including potential trip-reducing measures such as bike share strategies, bike parking, expansion of car share programs near high density areas, bus stop improvements (e.g. shelters and “next bus” technologies), crosswalk improvements, pedestrian wayfinding signage, etc.</p>	<p>No Mitigation Required. This measure is directed at the City and not at individual projects. Nevertheless, the Project will comply with the City’s TDM Ordinance.</p>
<p>T3 In areas where implementation of the proposed project could potentially result in diversion of traffic to adjacent residential streets, LADOT shall monitor traffic on identified residential streets, upon request submitted through the Council Office, to determine if traffic diversion occurs. If traffic on residential streets is found to be significantly impacted, in accordance with LADOT’s Traffic Study Policies and procedures, LADOT will work with neighborhood residents to identify and implement appropriate traffic calming measures.</p>	<p>No Mitigation Required. As discussed in the Transportation Assessment (included in Appendix G of this Initial Study), the Project would not result in any adverse impacts to either Cochran Avenue or Cloverdale Avenue, and therefore, the Project would not be required to implement this mitigation measure.</p>
<p>T4 In areas where the implementation of the proposed project could potentially affect transportation systems managed by other agencies, such as Caltrans or Metro, or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements in accordance with the goals and policies of Mobility Plan 2035 and seek opportunities to jointly pursue funding. Mobility solutions shall be focused on safety, enhancing mobility options, improving access to active modes, and implementing TDM measures to achieve both local and regional transportation and sustainability goals.</p>	<p>No Mitigation Required. As discussed in the Transportation Assessment (included in Appendix G of this Initial Study), the Project would not affect transportation systems managed by other agencies. Therefore, the Project would not be required to implement this mitigation measure.</p>

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Mobility Plan EIR Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>T5 LADOT, Los Angeles Fire Department (LAFD) and Department of City Planning (DCP) shall coordinate and review design plans involving lane reallocation to ensure that emergency response access is adequately maintained (for example by expanding the Fire Preemption System).</p>	<p>No Mitigation Required. This measure is directed at the City and not at individual projects. Nevertheless, as discussed in Section 6.IX(f) of the Initial Study, the Project would be subject to the City’s existing regulations that require the Project to comply with the Fire Code and LAMC emergency access requirements, which would ensure that the Project would not impede emergency access within the Project Site or vicinity.</p>
<p>T6 Construction activities will be managed through the implementation of a traffic control plan to mitigate the impact of traffic disruption and to ensure the safety of all users of the affected roadway. The plan will address construction duration and activities and include measures such as operating a temporary traffic signal or using flagmen adjacent to construction activities, as appropriate.</p>	<p>No Mitigation Required. As discussed in the Transportation Assessment Letter prepared by LADOT (included in Appendix G of this Initial Study), the Project would be required to implement a Construction Work Site Traffic Control Plan, prior to the start of any construction work. This plan would include the same components, as applicable, as MM T6. Therefore, the Project would not be required to implement MM T6.</p>
LAND USE AND PLANNING	
<p>LU1 Prior to the decision to remove on-street parking, the City of Los Angeles shall meet with the affected business and property owners to discuss the potential for the removal of on-street parking to affect the economic viability of the affected businesses. The City shall identify parking replacement options to businesses that do not have off-street parking and would be substantially affected by the permanent removal of on-street parking.</p>	<p>No Mitigation Required. As discussed in the Transportation Assessment (included in Appendix G of this Initial Study), the Project would not remove any on-street parking. Therefore, the Project would not be required to implement this mitigation measure.</p>
NOISE AND VIBRATION	
<p>N1 Construction activity that would last more than a day, that could increase ambient noise by more than 5 dBA, and would be located within 500 feet of a sensitive land use shall incorporate measures to reduce noise levels at sensitive receptors including, but not limited to, sound walls, sound blankets on impact equipment, and engine mufflers to reduce noise levels to acceptable levels. The noise reduction levels achieved by the measures shall limit noise increases to less than 5 dBA over the existing ambient levels.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM N1 to the Project.</p>
<p>N2 A project-specific vibration analysis shall be completed if the City determines that construction equipment would be located within 11 feet of non-engineered timber and masonry buildings (typical of residential buildings and institutional buildings). Potential vibration impacts shall be mitigated such that vibration levels do not exceed 0.3 inches per second at 11 feet. Methods to reduce vibration include, but are not limited to, choosing to use light weight equipment when an option between equipment types is available and avoiding impact equipment (e.g., jackhammers).</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to vibration. Therefore, the EIR will address the applicability of MM N2 to the Project.</p>

**Table J-1
Mobility Plan EIR Mitigation Measures**

Mitigation Measures	Applicability to the Project
BIOLOGICAL RESOURCES	
<p>B1 <i>Special-Status</i> Species and Habitat. For future enhancements occurring within 200 feet of a Significant Ecological Area designated by the County of Los Angeles or within 200 feet of areas containing native vegetation, such as open space and undeveloped areas, a project-specific biological resource survey and assessment shall be conducted and prepared that discloses any potential impacts to special status species and habitats, and mitigates, to the extent feasible, the impacts of the mobility improvements. In addition, prior to implementation of mobility improvements, all required permits must be obtained; permits for work in wetland and riparian habitats frequently require project-specific measures to preserve resources.</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as discussed in Section 6.IV(b) of the Initial Study, the Project Site is not located within a Significant Ecological Area and does not contain any wetlands, riparian habitats, sensitive natural community or 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, and no impacts related to this issue would occur. The Project Site is located in an urbanized area of the City on a site that is zoned [Q]C4-2-CD) and [Q]C2-1-CDO and is currently developed with retail uses. Therefore, no mitigation measures are required.</p>
<p>B2 <i>Wetland Habitat</i>. For mobility improvements that extend into the Ballona wetlands, all applicable wetland permits shall be acquired. These permits include, but would not be limited to, a Section 404 Wetlands Fill Permit from the United States Army Corps of Engineers, or a Report of Waste Discharge from the Regional Water Quality Control Board (RWQCB), and a Section 401 Water Quality Certification from the RWQCB. Additionally, a Section 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) would be required for development that would cross or affect any stream course.</p> <p>Where feasible, the maximum amount of existing wetlands shall be preserved and minimum 25- to 50-foot buffers around all sides of these features shall be established. In addition, the final project design shall not cause significant changes to the pre-project hydrology, water quality, or water quantity in the wetland that is to be retained. This shall be accomplished by avoiding or repairing any disturbance to the hydrologic conditions supporting these wetlands, as verified through wetland protection plans.</p> <p>Where avoidance of the Ballona Wetlands is not feasible, then mitigation measures shall be implemented for the project-related loss of any existing wetlands on site, such that there is no net loss of wetland acreage or habitat value. Wetland mitigation shall be developed as a part of the Section 404 Clean Water Act permitting process, or for nonjurisdictional wetlands, during permitting</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as discussed in Section 6.IV(c) of this Initial Study, the Project Site is not located on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies, and would extend into the Ballona wetlands. Moreover, the Project Site is an infill site in an urban setting in a region that is fully developed and would not affect species movement or policies or regulations protecting biological resources. No impacts related to this issue would occur, and no mitigation measures are required.</p>

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Mobility Plan EIR Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>through the RWQCB, CDFW and/or USFWS. Mitigation is to be provided prior to construction related impacts on the existing wetlands. The exact mitigation ratio is variable, based on the type and value of the wetlands affected by the project, but agency standards typically require a minimum of 1:1 for preservation and 1:1 for construction of new wetlands. In addition, a Wetland Mitigation and Monitoring Plan shall be developed that includes the following:</p> <ul style="list-style-type: none"> • Descriptions of the wetland types, and their expected functions and values. • Performance standards and monitoring protocol to ensure the success of the mitigation wetlands over a period of five to ten years. • Engineering plans showing the location, size and configuration of wetlands to be created or restored. • An implementation schedule showing that construction of mitigation areas shall commence prior to or concurrently with the initiation of construction. • A description of legal protection measures for the preserved wetlands (i.e., dedication of fee title, conservation easement, and/ or an endowment held by an approved conservation organization, government agency or mitigation bank). 	
<p>B3 Migratory Birds. To prevent the disturbance of nesting native and/or migratory bird species, the City shall require that clearing of street trees or other vegetation should take place between September 1 and February 14. If construction is scheduled or ongoing during bird nesting season (February 15 to August 31), the City of Los Angeles shall require that a qualified biologists conduct a nesting bird survey within 250 feet of the construction activity, no less than 14 days and no more than 30 days prior to the commencement of construction activities. Surveys shall be conducted in accordance with CDFW protocols, as applicable. If no active nests are identified on or within 250 feet of the construction activity, no further mitigation is necessary. A copy of the preconstruction survey shall be submitted to the Department of City Planning. If an active nest is identified, construction shall be suspended within 100 feet of the nest until the nesting cycle is complete, as determined by a qualified ornithologist or biologist.</p>	<p>No Mitigation Required. The Project would comply with applicable regulatory requirements, which include the MBTA (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Nevertheless, the Project would implement the second and third paragraphs of MM 4.3-1(b), with respect to nesting birds, from the City's Housing and Safety Element EIR, which is equal to or more effective than MM B3, and which would ensure that Project impacts with respect to migratory birds would be less than significant. Therefore, the Project would not be required to implement MM B3.</p>

Wilshire Community Plan EIR Mitigation Measures

The EIR prepared for the Wilshire Community Plan includes “mitigation policies” that are generally directed at the City and not at individual development projects, including with respect to land use, public services (fire, libraries, parks, and schools), utilities (water, energy, wastewater, and solid waste), transportation, geology, and hazards (safety/risk of upset). The analysis provided in the Initial Study determined that mitigation measures are not required for these issues, and Project impacts would be less than significant without mitigation. Therefore, the Project would not be required to implement any of the Community Plan mitigation policies related to these topics.

With respect to police protection, the Wilshire Community Plan EIR also includes mitigation policies directed at the City and not at individual development projects. While the analysis in the Initial Study determined that Project impacts with respect to police protection would be less than significant, the Project would nevertheless implement Mitigation Measures 4.12-2(a) and 4.12-2(b) from the City’s Housing and Safety Element EIR with respect to police protection. Therefore, the Project would not be required to implement the mitigation policies from the Community Plan EIR related to police protection.

With respect to air quality, the analysis contained in the Initial Study determined that Project impacts to air quality would be less than significant and no mitigation measures would be required. Nevertheless, as the Project’s construction period would be longer than 18 months and the Project would be located within 500 feet of a residence or other sensitive receptor, the Project would implement Mitigation Measure 4.3-2 from the City’s Housing and Safety Element EIR, which requires either a construction health risk assessment or the use of Tier 4 construction equipment. No additional mitigation would be required, and therefore, the Project would not be required to implement the air quality mitigation policies from the Community Plan EIR.

With respect to noise, the EIR will include an analysis of Project noise impacts. Therefore, the EIR will determine whether the noise mitigation policies from the Community Plan EIR are applicable to the Project.

With respect to historical resources, the Community Plan EIR includes mitigation policies directed at the City. As discussed in the Initial Study, the EIR will include an analysis of Project impacts with respect to historical resources, to include a historical resources evaluation, consistent with Mitigation Measure 4.4-1(a) from the City’s Housing and Safety Element EIR. The EIR will also consider the applicability of the Community Plan EIR mitigation policies related to historical resources.

With respect to archaeological and paleontological resources, the Project would implement Mitigation Measure 4.4-2 (archaeological resources) and Mitigation Measures 4.5-1(a) through 4.5-1(d) (paleontological resources) from the City’s Housing and Safety Element EIR, which are equal to or more effective than the mitigation policies provided in the Community Plan EIR. Therefore, the Project would not be required to implement the mitigation policies related to archaeological and paleontological resources from the Community Plan EIR.