

Mitigation Measure Applicability Table

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
Air Quality		
4.2-2(a): Construction Emissions Reduction	No	Applicable to projects with any of the following characteristics: ▪ Demolition of more than 13,500 square feet of building area; ▪ Greater than 5,000 cubic yards of soil cut/fill; ▪ Greater than 5-acres of graded area; or use of more than ten pieces of heavy-duty construction equipment and 150 truck trips (or a total of 6,000 vehicle miles traveled by truck) on any given day during demolition, site clearing, or grading. The Project does not include any demolition, will export approximately 1,950 cy of soil, will not grade an area greater than 5 acres, and will not require more than 10 pieces of heavy-duty construction equipment and 150 truck trips daily. Therefore, this measure is not applicable to the Project.
4.2-2(b): Operations Emissions Reduction	No	Applicable to projects that include more than 462 single-family residential units, 612 multi-family units, or any equivalent combination thereof. The 425 N. Mount Holyoke Avenue Project includes one single-family residential unit and an attached accessory dwelling unit (ADU). Therefore, this measure is not applicable to the Project.
4.2-3: Construction TAC Reduction Measures	Yes	Applicable to projects with an anticipated construction duration of greater than 18 months and located within 500 feet of a residence. Requires preparation of a construction health risk assessment (with mitigation as needed) or acceptance of a condition of approval requiring the use of construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all construction equipment rated 50 horsepower or greater. The Project's construction duration could be up to 30 months and is located within 500 feet of a residence. The Project applicant accepts the condition requiring the use of Tier 4 equipment for construction equipment rated 50 horsepower or greater. <i>The Project will be required to use construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all equipment rated 50 horsepower or greater. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.</i>

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Biological Resources		
4.3-1(a): Biological Resources Reconnaissance Survey and Reporting	Yes	Applicable to projects that require vegetation removal, ground disturbance, or staging of vehicles, equipment, or materials on natural or disturbed but undeveloped area that contain or have the potential to support special-status species (e.g., nesting passerines) as determined by the Department of City Planning. The applicant shall be required to conduct a biological resources assessment to determine the presence or absence of sensitive species. A Biological Resources Report (BRR) for the 425 N. Mount Holyoke Avenue Project was originally prepared in May 2024. The BRR evaluated the 0.96-acre Project site and a 500-foot buffer surrounding the site, together known as the Biological Study Area. The report was updated in 2026 acknowledging the Palisades Fire that occurred in January 2025.¹ A memo detailing site conditions following the Palisades Fire has also been prepared.² A reconnaissance-level biological survey of the Project site was completed on August 2, 2023 and a follow-up survey on August 30, 2023. A third survey was completed on April 7, 2024 with an emphasis on gathering botanical information during the peak blooming season. The surveys focused on documenting the presence/absence and condition of water resources, vegetation communities and habitats, and flora and fauna. A fourth site visit was completed on June 24, 2026 to document post-fire site conditions. In November 2024, a tree report was prepared for the Project site.³ The report noted that there are no trees or shrubs considered protected native within the City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance. Water Resources. The BRR confirmed that there are no natural water features present on the Project site and the Project would have no impact on water resources. As with any construction activities, the Project has the potential to have significant indirect and cumulative impacts to water resources due to run-off during storm events. Run-off impacts to water quality would be minimized through compliance with the City-mandated Low Impact Development ordinance, which will reduce run-off to at or below pre-development levels. Vegetation Communities and Habitats. While the Project site had been cleared in compliance with the City's fuel modification requirements shortly before the first field survey, later field observations and high-resolution aerial photography assisted in accurately representing on-site native conditions. This resulted in the classification/mapping of 11 community/land cover types in the Biological Study Area. Of these community/land cover types, only one is considered to be sensitive, California Brittle Bush – Ashy Buckwheat Scrub (<i>Encelia californica</i> – <i>Eriogonum cinereum</i> Shrub Alliance).

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		Within the Project site, this Shrub Alliance represents approximately 0.1 acre, or 10 percent of the site. Based on Exhibit 3 of the BRR, this community/land cover is expected to be completely outside of the Project's development footprint. Because this Shrub Alliance would be retained as-is on the Project site, the Project would not have a significant impact on sensitive vegetation. As a project in the coastal zone, the BRR evaluated whether any environmentally sensitive habitat areas (ESHAs) may exist on or in the vicinity of the Project site and whether an ESHA would be impacted. Section 30107.5 of the Coastal Act defines an RSHA as <i>"any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments."</i> In practice, even vegetation community types otherwise designated as sensitive are not treated as ESHA when they are extensively disturbed by anthropogenic activities such as fuel modification. Such is the case with the small area of California Brittle Bush – Ashy Buckwheat Scrub on the Project site, which features relatively low cover of the native plants that define it and significant introgression by non-native plants. Therefore, the community within the Project site would not be classified as an ESHA. There are no other areas or communities within the Biological Study Area that would be considered an ESHA. Additionally, the site visit completed in 2026 confirmed the small area of California Brittle Bush – Ashy Buckwheat Scrub is no longer on the site, though a handful of buckwheat plants are present, most likely due to the Palisades Fire. While no mitigation measures are recommended as impacts would be less than significant, the BRR does recommend that the landscape architect and contractor avoid the use of invasive plants listed on the California Invasive Plant Council's Cal-IPC Inventory of invasive plants. This recommendation is included in the description as Project Design Feature 1. Project Design Feature 1. Invasive species: the landscape architect and contractor will avoid the use of invasive plants listed on the California Invasive Plant Council's Cal-IPC Inventory of invasive plants. Flora: No special-status plants were observed in the study area, and none have the potential to occur based on the level of disturbance from fuel modification, other plant cover, and the surrounding developments that fragment the area and degrade the conditions. The BRR noted the presence of an Elderberry (<i>Sambucus Mexicana</i>) shrub community that could be potential habitat for a protected species, however the Elderberry (<i>Sambucus Mexicana</i>) shrub community is outside of the area that would be developed by the Project and would therefore not be adversely affected.

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		Fauna: Of the 84 special-status faunal taxa analyzed for the BRR, four were determined to be present, two were determined to have a high potential for occurrence, five were determined to have a moderate potential for occurrence, eight were determined to have a low potential for occurrence, and 65 were determined to have no potential for occurrence. The species determined to be present or a high potential for occurrence are listed below. <table> <tr> <th>Species</th><th>Potential Occurrence</th><th>Potential for Project to Affect</th></tr> <tr> <td>American Peregrine Falcon (<i>Falco peregrinus anatum</i>)</td><td>Moderate</td><td>None</td></tr> <tr> <td>Allen's Hummingbird (<i>Selaphorus sasin</i>)</td><td>Present</td><td>Low</td></tr> <tr> <td>Nuttall's Woodpecker (<i>Dryobates nuttallii</i>)</td><td>Present</td><td>Low</td></tr> <tr> <td>Oak Titmouse (<i>Baeolophus inornatus</i>)</td><td>High</td><td>Low</td></tr> <tr> <td>Wrentit (<i>Chamaea fasciata</i>)</td><td>Present</td><td>Low</td></tr> <tr> <td>California Thrasher (<i>Toxostoma redivivum</i>)</td><td>Present</td><td>Low</td></tr> <tr> <td>Yuma Myotis (<i>Myotis yumanensis</i>)</td><td>Moderate</td><td>None</td></tr> </table> City Planning Document CP-4074 requires assessment of the potential for additional species or their habitat, including Mountain Lion (<i>Puma concolor</i>), Monarch butterflies, bats, and nesting birds. The BRR evaluated the potential for these species and/or their habitats to occur within the Project site and concluded that Mountain Lion would not be expected to occur. Because there are no suitable sites for Monarchs to overwinter within the biological study area, impacts to Monarch butterflies would not be expected to occur. If bats are present, it would be for aerial foraging area during nighttime. The value of the Project site for foraging habitat would not be significantly adversely affected by the Project. As required by Housing Element EIR Mitigation Measure 4.3-1(b), preconstruction surveys shall be performed if work will take place within the nesting season. The BRR includes Project Design Feature 2, which requires pre-construction surveys and nest avoidance. Because this measure is already included in Mitigation Measure 4.3-1(b) discussed below, the BRR's Project Design Feature 2 is not required. Wildlife Movement: Given the surrounding development, the Project site is not part of a wildlife corridor. A majority of the Project site is a steep 30–40-degree slope, which could act as a further deterrent for wildlife. Based on these observations, the Project site is not part of an wildlife movement corridor and development of the Project site would not obstruct wildlife movement beyond existing conditions.	Species	Potential Occurrence	Potential for Project to Affect	American Peregrine Falcon (<i>Falco peregrinus anatum</i>)	Moderate	None	Allen's Hummingbird (<i>Selaphorus sasin</i>)	Present	Low	Nuttall's Woodpecker (<i>Dryobates nuttallii</i>)	Present	Low	Oak Titmouse (<i>Baeolophus inornatus</i>)	High	Low	Wrentit (<i>Chamaea fasciata</i>)	Present	Low	California Thrasher (<i>Toxostoma redivivum</i>)	Present	Low	Yuma Myotis (<i>Myotis yumanensis</i>)	Moderate	None
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		Based on the analysis in the BRR, construction of the Project would not result in significant impacts to biological resources. Additionally, Project Design Feature 1 ensures that only native plant species will be used for landscaping and compliance with Mitigation Measure 4.3-1(b) will minimize impacts on potential nesting birds. <i>The project applicant shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of Proposed Project on wildlife corridors. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to Department of City Planning (DCP) prior to project approval, and the project may proceed without any further biological investigation. If wildlife corridors are present, the report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.</i>
4.3-1(b): Sensitive Species/Habitat Avoidance: Pre-Construction Bird Nest Surveys, Avoidance, and Notification	Yes	Applicable to projects where sensitive species and/or habitat are identified in the biological resources assessment prepared pursuant to MM 4.3-1(a). The measure requires pre-construction nesting surveys when construction activities are initiated during the bird nesting season (February 1 – August 31). Additionally, the measure requires Project plans to include a statement acknowledging compliance with the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGF). The BRR discussed relative to MM 4.3-1(a) above noted the potential for nesting birds on the Project site and included PDF 2 which requires preconstruction nesting surveys to be done if ground disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (February 1 – August 31). However, compliance with MM 4.3-1(b) would

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		include the actions discussed in the PDF. This mitigation measure will be implemented by the Project and the statement regarding compliance with the MBTA and CFGC will be included in Project plans. <i>For all discretionary projects where sensitive species and/or habitat are identified in the biological resources assessment prepared pursuant to MM 4.3-1(a), the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and California Department of Fish and Wildlife (CDFW) prior to ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall be prepared and submitted to DCP and CDFW following construction.</i> <i>Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest.</i>

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		<i>Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective measures conducted shall be prepared by a qualified biologist.</i> <i>Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.</i>
4.3-1(c): Focused Surveys for Rare Plants	No	If indicated based on the biological resources assessment report required by MM 4.3-1(a), focused surveys for special status plants shall be conducted. As discussed above related to MM 4.3-1(a), the BRR noted that no special-status plants were observed in the study area, and none have the potential to occur based on the level of disturbance from fuel modification, invasive and ornamental plant cover, and the surrounding developments that fragment the area and degrade the conditions. No further action is needed and this mitigation measure is not applicable to the Project.
4.3-1(d): Adaptive Management Plan	No	If indicated as appropriate in a reconnaissance, pre-construction, or focused survey required by MM 4.3-1(a), (b), or (c), the biologist shall prepare an adaptive management plan for future operations to ensure that operations will not result in impacts to special status species. Based on the results of the BRR, there is no need for an adaptive management plan and this measure is not applicable to the Project.
4.3-2(a): Habitat Mitigation and Monitoring Plan	No	Applicable to projects in areas potentially containing sensitive natural communities or jurisdictional waters and riparian habitat. While the BRR noted that no jurisdictional wetlands or non-wetland waters occur within the Project site, the site does contain one sensitive community, California Brittle Bush – Ashy Buckwheat Scrub (<i>Encelia californica</i> – <i>Eriogonum cinereum</i> Shrub Alliance). However, this Shrub Alliance is completely outside of the development footprint of the Project and would not be adversely affected by the Project. Additionally, a survey of the site in June 2026 revealed that the California Brittle Bush – Ashy Buckwheat Scrub community no longer exists on the site, likely due to the Palisade Fire in January 2025. Because there are no sensitive natural communities, jurisdictional waters, or riparian habitat that would be adversely affected by the Project, this mitigation measure is not applicable to the Project.
4.3-2(b): Protected Tree and Tree Canopy Survey	No	Applicable to discretionary projects that include the removal of trees subject to the City's Protected Tree Ordinance. According to the BRR, one shrub protected by the City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance was detected during the survey. The

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		Elderberry (<i>Sambucus Mexicana</i>) shrub is outside of the area that would be developed by the Project and would therefore not be adversely affected. As the proposed Project would not include impacts on any trees or shrubs protected by City ordinance, this mitigation would not be applicable to the proposed Project.
Cultural Resources		
4.4-1(a): Identification of Built-Environment Historical Resources	Yes	This measure is applicable if any of the three triggers included below are met: ▪ Survey LA shows resources that are potentially eligible for listing on the City, state, or national historical register, individually or as a contributor to a district; ▪ A different rigorous historical survey that has been reviewed by OHR and accepted by the City, shows resources that are potentially eligible for listing on the City, state, or national historical register, individually or as a contributor to a district; and/or ▪ Building or structure was not assessed in Survey LA (this includes resources in Survey LA listed with a QQQ code) but is 45 years or older. If triggered, a historical resource assessment needs to be prepared to determine if there is a resource that meets the definition of a historical resource under PRC Section 21084.1. The Project site is vacant, but the residential structure located adjacent to the northern property boundary at 505 North Radcliffe Avenue was evaluated. The historic evaluation determined that the residence at 505 North Radcliffe Avenue met only the third threshold and could find no evidence to support the residence being categorized as a historical resource. Because the only nearby structure does not qualify as a historical resource, this measure is not applicable to the Project. An assessment was prepared by an architectural historian and provided to the City. As discussed in the assessment, based on available information and in accordance with PRC 21084.1, the Project would not cause a substantial adverse change in the significance of an historical resource and thus impacts would be less than significant.⁴ <i>For discretionary projects, the following procedures shall be implemented to identify historical resources, as defined by Public Resources Code Section 21084.1, located on or near a development site and implement appropriate techniques to avoid or reduce significant impacts to historical resources.</i>

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		<i>The City of Los Angeles Historic Resources Survey (SurveyLA) results shall be consulted to determine whether the project area, or adjacent areas, have been subject to previous cultural resources studies and whether historical resources were identified.</i> <i>If a development involves the alteration or demolition of a property 45 years of age or older that was not evaluated in SurveyLA, including sites with a QQQ code, a historical resources evaluation shall be prepared for the development. The evaluation shall be prepared according to the following standards:</i> <i>▪ The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history.</i> <i>▪ The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and the City of Los Angeles Office of Historic Resources (OHR) to identify any potential historical resources within the Area of Potential Effects.</i> <i>Those buildings and structures required to be assessed in a historical resource evaluation not located in an HPOZ shall be evaluated within their historic context and documented in a report meeting the OHP and OHR guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the OHR for review and concurrence. If, as a result of the cultural resources records search or the subsequent historical resources evaluation, it is determined that the proposed development would result in a significant adverse effect to one or more historical resources, appropriate techniques consistent with the Secretary of Interior Standards to avoid or reduce significant impacts to the degree feasible shall be implemented. Measures to reduce impacts shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary under the circumstance (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a mitigation plan identifying measures for the treatment or protection of character-defining features shall be provided to the City for review. Measures may include but not be limited to mitigation measures 4.4-1(b) to 4.4-1(j) below.</i>
4.4-1(b): Rehabilitation of Historical Resources	No	Applicable when indicated by the results of a historical resources evaluation prepared under MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.

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4.4-1(c): Design Requirements for New Construction	No	Applicable when indicated by the results of a historical resources evaluation prepared under MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.
4.4-1(d): Relocation and Rehabilitation of Historical Resources	No	Applicable when indicated by the results of a historical resources evaluation prepared under MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.
4.4-1(e): Historic American Building Survey Documentation	No	Applicable when indicated by the results of a historical resources evaluation prepared under MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.
4.4-1(f): Interpretive Program	No	Applicable when indicated by the results of a historical resources evaluation prepared under MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.
4.4-1(g): Construction Monitoring, Salvage, and Reuse	No	Applicable when indicated by the results of a historical resources evaluation prepared under MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.
4.4-1(h): Temporary Protective Relocation	No	Applicable when indicated by the results of a historical resources evaluation prepared for MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.
4.4-1(i): Excavation and Shoring Plan	No	Applicable when indicated by the results of a historical resources evaluation prepared under MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.
4.4-1(j): Structural Construction Monitoring	No	Applicable when indicated by the results of a historical resources evaluation prepared under MM 4.4-1(a). As discussed related to MM 4.4-1(a), the Project would have no impact on historical resources and this measure is not required for this Project.
4.4-2: Archaeological Resources	Yes	Applicable to discretionary projects that involve ground disturbance in native soils or soils of unknown origin. Requires identification of archaeological resources located within the project site and implementation of techniques to reduce substantial adverse effects associated with inadvertent discovery of archaeological resources. The first requirement is preparation of a cultural resources assessment. Based on that assessment, additional actions identified in the mitigation measure may be needed. An Archaeological, Paleontological, and Tribal Cultural Resources Assessment Report (Assessment Report) evaluated the potential for archaeological resources to be present within or near the Project site.⁵ The Assessment Report included an extensive literature review and a pedestrian

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		survey. Based on all evidence examined, the Assessment Report concluded that no pre- or post-contact archaeological resources were identified within the Project site and the likelihood for yet unidentified resources of the same to exist with the proposed Project site is low. Accordingly, the Assessment Report recommended MM 4.4-2 should be implemented to support proper response and treatment in the event of an inadvertent discovery of archaeological resources, and thereby ensure that impacts remain less than significant. <i>The Project shall implement the following procedures to identify archaeological resources located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.</i> A. <i>The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC).</i> B. <i>If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible.</i> C. <i>Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains.</i> D. <i>Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist.</i>

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		<i>E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards.</i> <i>F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (http://ohp.parks.ca.gov/pages/1054/files/armr.pdf).</i> <i>G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.</i> <i>H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.</i> <i>I. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased</i>

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		entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. J. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes. K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
Geology and Soils		
4.5-1(a): Paleontological Procedures for Discretionary Projects	Yes	Applicable to all discretionary projects that involve excavation or grading activities at depths greater than previous disturbance on the respective sites. Requires a resource assessment and records search for the presence of paleontological resources to determine if the Project Site is underlain by paleontological resources. If the assessment determines the site is underlain by soils or geologic units with a medium to high potential for containing paleontological resources, a qualified paleontologist shall prepare a monitoring plan, and worker education plan. An Archaeological, Paleontological, and Tribal Cultural Resources Technical Assessment Report (Assessment Report) evaluated the potential for paleontological resources to be present within or near the Project site.⁶ The Assessment Report stated that no paleontological resource localities have been documented within the site. However, nearby paleontological resource localities have been recorded in the surrounding area and within the same sedimentary deposits. A review of mapped soils and the geotechnical study findings demonstrate that Pleistocene-era alluvial soils are documented within the site between seven and a half (7.5) and eleven (11) feet bgs and extending to between fourteen (14) and forty (40) feet bgs. Based on the documented presence of paleontological resources within Late Pliocene coarse-grained sandstone and hard conglomerate and sandstone located as near as 0.5 mile to the north, 0.4 mile to east and 0.25 mile to the south of the site, there is potential for finding intact paleontological resource deposits. Accordingly, the Assessment Report recommended the Housing Element Program EIR Mitigation Measure 4.5-1(d), below, be implemented to ensure the proper response and treatment in the event of an inadvertent discovery of paleontological resources, and thereby ensure that impacts remain less than significant. <i>Prior to the start of construction, the following shall be conducted as discussed in detail below: prepare a resource assessment and records search for the presence of paleontological resources to determine if the project site is underlain by paleontological resources; monitor all excavation and grading activities in areas underlain by soils or geologic units potentially containing paleontological resources; and identify, record, and evaluate all paleontological resources uncovered during project construction and submit a paleontological assessment report to the City for review and approval. In addition, during project construction, the following shall be conducted as discussed in detail below: cease all construction activities in the event of the discovery of paleontological resources; conduct fossil recovery as necessary by a qualified paleontologist; avoid handling of paleontological resources by parties other than the qualified paleontologist responsible for conducting fossil recovery; and resume construction activities only upon clearance by the</i>

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
		<i>qualified paleontologist. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less-than significant level:</i> ▪ <i>Prior to excavation and grading activities, a qualified paleontologist shall prepare a resource assessment and records search for the potential presence of paleontological resources. This assessment shall be informed by records from the Natural History Museum of Los Angeles County.</i> ▪ <i>If the assessment determines the project site is underlain by soils or geologic units with a medium to high potential for containing paleontological resources, a qualified paleontologist shall prepare a monitoring plan, and worker education plan. The paleontologist's assessment and any required monitoring or required worker education plan shall be submitted to the City for review and approval prior to the commencement of construction activities. Any monitoring plan shall include requiring compliance with Mitigation Measure 4.5-1(d) for discovery, salvage and treatment.</i>
4.5-1(b): Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring	No	Applicable when required by the cultural resources assessment prepared under MM 4.5-1(a). As discussed related to MM 4.5-1(a), there is potential to find intact paleontological resource deposits within the Project site. The Assessment Report recommended implementation of Mitigation Measure 4.5-1(d), below, but not this measure. This measure is not applicable to the Project.
4.5-1(c): Construction Monitoring	No	Applicable when required by the cultural resources assessment prepared under MM 4.5-1(a). There is potential for finding intact paleontological resource deposits within the Project site. The Assessment Report recommended implementation of Mitigation Measure 4.5-1(d), below, but would not require construction monitoring. This measure is not applicable to the Project.
4.5-1(d): Fossil Discovery, Salvage, and Treatment	Yes	Applicable to all discretionary projects. Requires the following measure to be shown on all plans and adhered to through construction: As discussed relative to Mitigation Measure 4.5-1(a) the Assessment Report prepared for the Project concluded that there is potential for finding intact paleontological resource deposits during Project construction. Furthermore, the Assessment Report recommended implementation of this measure. Therefore, this measure is applicable to the Project, and the Project would comply with the above requirements, which would appear on Project plans. <i>Discovery. If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state,</i>

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
		<i>and local guidelines, Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s).</i> <i>Fossil Salvage and Treatment. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City.</i>
Hazards and Hazardous Materials		
4.7-2(a): Environmental Site Assessment	No	Applicable to sites located on or within 500 feet of a Hazardous Material site listed on the following databases: ▪ SWRCB GeoTracker (refer to https://geotracker.waterboards.ca.gov); ▪ DTSC EnviroStor (refer to https://www.envirostor.dtsc.ca.gov/public); ▪ DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov); ▪ LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/publicrecords); ▪ Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-recordsrequests); ▪ SCAQMD Facility Information Detail (refer to https://xappprod.aqmd.gov/find); Or:

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
		▪ Located on or within 500 feet of a Hazardous Materials site designated as a RCRA Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or ▪ Located on an Oil Drilling District or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by CalGEM (refer to https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx); or ▪ Located on any land currently or previously designated with an industrial use class or industrial zoning; or ▪ Located on land currently or previously used for a gas station or dry-cleaning facility. Or: ▪ The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station, or dry-cleaner, or otherwise is contaminated with hazardous substances. And: ▪ The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or conditions. The Project site is not located on a hazardous waste site included on any list compiled pursuant to Section 65962.5 of the Government Code, nor are there any known hazardous conditions on the site. The California Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB) each maintain a database (EnviroStor and GeoTracker, respectively) that provides access to detailed information on hazardous waste sites and their cleanup statuses. EnviroStor focuses on hazardous waste facilities and sites with known contamination or sites with possible reason for further investigation. GeoTracker focuses on sites that impact or have the potential to impact water quality in California, with an emphasis on groundwater. A search of the EnviroStor and Geotracker databases was conducted to determine the presence of hazardous materials sites on the Project site or within 1,000 feet of the Project site. According to the Geotracker database, a closed Leaking Underground Storage Tank (LUST) cleanup site is located more than 2,000 feet southeast of the Project site along Pacific Coast Highway (15101 Pacific Coast Highway). Regulatory activities began on this site in 1988, and the case was closed in 2022.⁷ There are no EnviroStor cleanup sites within 1,000 feet of the Project site.⁸ Given that these properties have been cleaned of hazard materials and are located below the elevation of the Project site, there would be no impacts associated with hazardous materials sites.

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
		Because the Project site is not included on any list of hazardous materials sites, this measure is not applicable to the Project.
4.7-2(b): Site Remediation and Health and Safety Plan	No	Applicable to sites requiring remediation as identified during MM 4.7-2(a). As discussed relative to MM 4.7-2(a), the Project site is not identified on any hazardous materials site lists and MM 4.7-2(b) is not applicable.
Hydrology and Water Quality		
4.8-1: Drainage Pattern Alterations and Flood Control	No	MM 4.8-1 applies to projects for which the City of Los Angeles Department of Public Works (DPW) has determined additional study is required for potential impacts to flood control and drainage which cannot be mitigated through implementation of standard regulations, including Low-Impact Development requirements. DPW has confirmed that no additional study is necessary for the Project and no mitigation measures are required. The City of Los Angeles Bureau of Engineering (BOE) confirmed that there are no requirements that would need to be met regarding flood zone clearance and compliance with the National Flood Insurance Program. Therefore, this measure is not applicable to the Project.
Noise		
4.10-1(a): Noise Shielding and Silencing	Yes	Requires power construction equipment, fixed or mobile, to be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Also requires equipment to be maintained and documentation to such to be kept onsite during any earthwork. The measure is to be shown on project plans. Power construction equipment will include required devices and be kept in good working order, with maintenance records to be kept on-site during earthwork activities. Additionally, this measure will be shown on Project plans. Text of measure to appear on plans: <i>Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the Project Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. Measure shall be shown on plans.</i>

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
4.10-1(b): Use of Driven Pile Systems	Yes	Requires driven (impact), sonic, or vibratory pile drivers not be used, except in locations where underlying geology renders alternative methods infeasible. Requirement shall be shown on plans. The Project would not include any pile driving activities. However, as the measure is applicable to all discretionary projects, the requirement shall be shown on plans. Text of measure to appear on plans: <i>Driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report. Requirement shall show on plans.</i>
4.10-1(c): Enclosures and Screening	Yes	Requires outdoor mechanical equipment to be enclosed or shielded from off-site noise-sensitive uses. Enclosure or screen shall be impermeable and break the line-of-site from the equipment and off-site noise-sensitive uses. The Project shall adhere to this requirement. <i>All outdoor mechanical equipment shall be enclosed or screened from off-site noise-sensitive uses. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment and off-site noise-sensitive uses.</i>
4.10-1(d): Construction Staging Areas	Yes	Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. Requirement shall be shown on plans. Text of measure to appear on plans: <i>Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. Requirement shall show on plans.</i>
4.10-1(e): Temporary Sound Barriers	No	Applicable to projects where construction activities are located within a line-of-site and within 500 feet of noise-sensitive uses. Requires the use of sound barriers, such as temporary walls or sound blankets, and requirement to be shown on plans. As discussed in detail in the Project's Noise Study, in accordance with CEQA, when a project would result in a significant and unavoidable impact, a lead agency must implement all feasible mitigation measures to reduce the potential impact. The Housing Element Program EIR included MM 4.10-1(c), Temporary Sound Barriers, a mitigation measure which would further reduce significant and unavoidable on-site construction noise impacts. MM 4.10-1(c) states, "Sound barriers, such as temporary walls or sound blankets, shall be erected between construction activities and noise-sensitive uses when construction activities are located within a line-of-sight to

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
		and within 500 feet of noise-sensitive uses. Requirement shall show on plans.” As shown in the on-site and off-site noise analysis, the Project would not exceed the City’s absolute construction noise threshold of 80 dBA. Thus, the Project’s on- and off-site construction noise would be less than significant and no mitigation is necessary. As stated, the in the Housing Element’s Program EIR Mitigation Monitoring Program, modifications and deletions to the Housing Element’s Program EIR mitigation measures are allowed if the Department of City Planning cannot find substantial conformance with the measure, the Project analysis discloses the impacts without implementation of the mitigation measure(s), and the analysis explains why the measure is no longer needed. In addition, as discussed in greater detail in the Project’s Noise Study, for a noise barrier to have any meaningful effect, the temporary wall or barrier would need to be constructed to a height that would obstruct or shield the equipment within a line of sight to and within 500 feet of Noise-Sensitive Uses and/or any observer within this distance. Given the steep topography and site access constraints, constructing such a noise barrier is technically infeasible. As such, the Project is not required to implement MM 4.10-1(e), as the Project’s noise analysis has demonstrated that on- and off-site construction noise impacts would be less than significant and no mitigation is required, and implementation of the mitigation measure is not technically feasible. All other applicable Housing Element Program EIR noise mitigation measures shall be implemented as part of the Project.
4.10-1(f): Project-Specific Construction Noise Study	Yes	Applicable to discretionary projects in the City that are located within 500 feet of noise-sensitive land uses and that have one or more certain characteristics, including 20,000 cubic yards or more of excavated material or construction duration exceeding 18 months. Requires preparation of a Construction Noise Study to characterize noise sources, quantify noise levels, and identify measures to reduce noise exposure. Because the Project is within 500 feet of an existing residence and construction would take approximately 30 months, this measure is applicable to the Project. In compliance with MM 4.10-1(f), a noise study was prepared for the Project, which included assessment of potential construction noise impacts.⁹ The study provides the estimated construction noise levels for various construction phases at the nearest sensitive receptors (437 Mount Holyoke Avenue and 505 Radcliffe Avenue). The estimated on-site noise levels during all stages of Project construction would not exceed significance thresholds for the nearest sensitive receptors. <i>A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for discretionary projects in the City located within 500 feet of noise-sensitive land uses and that have one or more of the following characteristics:</i>

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
		- Two or more subterranean levels or 20,000 cubic yards or more of excavated material; Construction duration (excluding architectural coatings) of 18 months or more; - Use of large, heavy-duty equipment rated 300 horsepower or greater; or - The potential for impact pile driving. The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (e.g., residences, transient lodgings, schools, libraries, churches [or other places of assembly], hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks), and identify measures to reduce noise exposure. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques may include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise sensitive land uses. Project Applicants shall be required to comply with all requirements of Mitigation Measures 4.10-1(a) through 4.10-5(e) in addition to any additional requirements identified and recommended by the Construction Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements. OR In lieu of the above measure, comply with all Environmental Protection Measures (EPMs) for construction noise or vibration and implementing regulations, including any noticing requirements, adopted by the Director of City Planning, if the Director has made the EPMs applicable to the project.
4.10-2: Project-Specific Operational Noise Study	No	Applicable to discretionary projects that include roof/pool decks that are not exclusively for the use of residents and their guests. Requires a project-specific operational noise study. Under Public Resources Code Section 21085, effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment. Because the Project involves facilities that will be for the exclusive use of the residents and their guests, this measure is not applicable to the Project.

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
4.10-3(a): Vibration Control Plan	No	Applicable to discretionary projects with construction activity that would include vibratory rollers or sonic pile drivers. Requires preparation of a Vibration Control Plan. The Project would not include any vibratory rollers or sonic pile driving. Therefore, this measure is not applicable to the Project.
4.10-3(b): Vibration Mitigation	Yes	Applicable to all discretionary projects. Restricts impact pile drive use, requires rubber-tired equipment, and that the requirement to be shown on plans. The Project shall adhere to this requirement. ▪ <i>Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or similar methods are alternatives that shall be utilized where geological conditions permit their use.</i> ▪ <i>Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment.</i> <i>The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices.</i> <i>Requirement to be on plans.</i> OR <i>In lieu of the above measure, comply with all Environmental Protection Measures (EPMs) for construction noise or vibration and implementing regulations, including any noticing requirements, adopted by the Director of City Planning, if the Director has made the EPMs applicable to the project.</i>
Public Services		
4.12-1(a): Design Plans Review	No	Applicable to discretionary housing project with more than 300 housing units or located in Very High Fire Hazard Severity Zones (VHFHSZ) or State Responsibility Areas (SRAs) where the Los Angeles Fire Department (LAFD) finds that existing regulations are not adequate to avoid fire risk. Requires design plans to demonstrate to LAFD's satisfaction that construction and design features would reduce fire potential and/or promote containment. LAFD has stamped/approved the Project architectural plans. LAFD did not require any additional studies and/or require implementation of mitigation measures, Therefore, this measure is not applicable to the Project.

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
4.12-1(b): Emergency Access	No	Applicable to discretionary housing project with more than 300 housing units or located in VHFHSZs or SRAs where LAFD finds that existing regulations are not adequate to avoid fire risk. Requires access roads and alleyways to remain clear and unobstructed in order to ensure access for emergency vehicles. LAFD has stamped the Project plans, indicating their approval. This also indicates that LAFD did not find that existing regulations would be inadequate to avoid fire risk. While the Project is within the VHFHSZ, as part of standard development procedures, the Project would comply with all applicable building code provisions and City regulations regarding fire safety. In addition, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel on public rights-of-way. There is no indication that any additional requirements would be needed. Therefore, this measure is not applicable to the Project.
4.12-1(c): Hillside Fire/Vegetation Management Plan	No	Applicable to discretionary housing project with more than 300 housing units or located in VHFHSZs or SRAs where LAFD finds that existing regulations are not adequate to avoid fire risk. Requires a 200-foot minimum Fuel Management Zone in place. LAFD has stamped/approved the Project's architectural plans... Therefore, this measure is not applicable to the Project.
4.12-1(d): Submittal of Plot Plan	No	Applicable to discretionary housing projects with more than 300 housing units or located in VHFHSZs or SRAs where LAFD finds that existing regulations are not adequate to avoid fire risk. Requires plot plan review by LAFD. LAFD has stamped/approved the Project's architectural plans. Therefore, this measure is not applicable to the Project.
4.12-2(a): Crime Prevention Unit Consultation	No	Applicable to discretionary projects with more than 300 units or on a project site of more than 10 acres. Requires consultation with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features. The Project site includes one residential unit and an attached ADU and totals 0.96 acres. Therefore, this measure is not applicable to the Project.
4.12-2(b): Security During Construction	No	Applicable to discretionary projects with more than 300 units or on a project site of more than 10 acres. Requires private security personnel to monitor vehicle and pedestrian access to the project site, patrol the project site, and install construction fencing and lighting. The Project site includes one residential unit and totals 0.96 acres. Therefore, this measure is not applicable to the Project.

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
Transportation		
4.14-1: Construction Management Plan	No	Applicable to discretionary projects that City of Los Angeles Department of Transportation (LADOT) determines will have potential impacts to the circulation system even with application of regulatory compliance measures. Requires preparation of a detailed Construction Management Plan (CMP) to be submitted to LADOT for review and approval. LADOT has reviewed the Project and does not find that a study is necessary or that compliance with existing regulations would not be adequate. No mitigation measures are necessary. Therefore, this measure is not applicable to the Project.
4.14-2: Transportation Demand Management Program	No	Applicable to discretionary projects that will have significant impacts to vehicle miles traveled (VMT) under LADOT Transportation Assessment Guidelines. Requires preparation of a Transportation Demand Management (TDM) program. Trip rates for the Project were obtained using the City of Los Angeles VMT Calculator, which was designed and intended to be used to develop project-specific daily household VMT per capita and daily work VMT per employee metrics for residential and office land use development projects in the City. The VMT Calculator uses the most recent version of the Institute of Transportation Engineers' (ITE) Trip Generation Manual to calculate VMT. Screening criteria included in the VMT Calculator are included below. If a Project meets any of these two screening criteria, the Project would not be required to perform a VMT analysis.¹⁰ ▪ Tier 1 Screening Criteria applies if projects will replace an existing number of residential units with a lesser number of residential units and is within one-half mile of a fixed-rail or fixed-guideway station. ▪ Tier 2 Screening Criteria: Indicates the net increase in daily trips and the net increase in daily VMT, and whether the Project consists of only retail uses less than or equal to 50,000 square feet. The Project would not meet Tier 1 or Tier 2 Screening Criteria, outlined above. However, per the VMT Calculator, the Project would result in an increase of 8 daily vehicle trips, or 71 daily VMT. Per LADOT's Transportation Assessment Guidelines, if a project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a development project would be required.¹¹ Because the Project would result in an increase of approximately 8 daily vehicle trips, much lower than the 250 daily trip threshold outlined by LADOT, a VMT analysis is not required. Therefore, this measure is not applicable to the Project.

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
Tribal Cultural Resources		
4.15-1(a): Native American Consultation and Monitoring for Discretionary Projects	Yes	Applicable to projects that involve ground disturbance in previously undisturbed soils. Requires a cultural resources assessment and records search of the project site and a study area of no less than 0.5 mile around the Project area. Projects that are determined by the initial assessment and records search to be within culturally or historically sensitive areas may require an expanded study area and further actions to reduce impacts. The first requirement is preparation of a cultural resources assessment. Based on that assessment, additional actions identified in the mitigation measure may be needed. As previously discussed regarding MM 4.4-1(a), an Archaeological, Paleontological, and Tribal Cultural Resources Technical Assessment Report (Assessment Report) was prepared for the proposed Project. The Assessment Report stated that the City sent notification letters to those California Native American tribes who have previously requested formal notification of proposed Projects under the agency's jurisdiction. One tribe, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh), responded requesting government-to-government consultation. As of July 2026, consultation between the City and the Kizh Tribe is ongoing and has not been closed. Further, in response to a requested Sacred Land File (SLF) Search, NAHC completed a SLF in February 2025 and notified the City that the results were positive. NAHC advised City staff to reach out to the Gabrielino Tongva Indians of California Tribal Council as well as 14 other Native American Tribes which may have knowledge of resources in the Project area. The City emailed the 15 tribes in July 2026. The Gabrielino Tongva Indians of California Tribal Council responded and requested a call to discuss potential resources. As August 31, 2026, consultation between the City and Tongva Tribe is ongoing and has not been closed. <i>The Project shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area.</i> <i>Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources</i>

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
		<i>Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground disturbing activities for the Project, including any archaeological testing. The CRMP shall include compliance with 4.15-1(b) and will provide details regarding the process for infield treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.</i> <i>OR</i> <i>In lieu of the above measure, comply with all Environmental Protection Measures (EPMs) for tribal cultural resources and implementing regulations, including any noticing requirements, adopted by the Director of City Planning, if the Director has made the EPMs applicable to the project.</i>
4.15-1(b): Discovery of Potential Tribal Cultural Resources	Yes	<i>In compliance with the Housing Element Checklist, any project that involves ground-disturbing activities of any kind shall impose the following mitigation measure. The Project will comply with this measure, and it shall be shown on all plans.</i> <i>In the event that Tribal Cultural Resources are discovered during Project activities, whether or not a tribal monitor is present, and there is no CRMP or the CRMP does not cover treatment of inadvertent discovery, all work within a 50-foot buffer of the find shall cease and a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall assess the find. Tribes that are culturally and historically affiliated with the Project area and have requested consultation shall be notified, should any potential tribal cultural resource be discovered during project implementation. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Unless agreed otherwise during the tribal consultation process or in a CRMP, if tribal cultural resources are discovered during construction, the applicant and/or owner shall retain a Qualified Tribal Monitor (as approved by the Tribe) if requested by the Tribe. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes. Any tribal cultural resources discovered shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative and in accordance with federal, state, and local guidelines. If not otherwise provided in the CRMP, the Lead Agency and/or applicant shall, in good faith,</i>

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
		<i>provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources. The location of the find of tribal cultural resources and the type and nature of the find will not be published, except to provide information to the Qualified Archaeologist, tribal representatives, and public agencies with jurisdiction or responsibilities related to the resources. An agreement will be reached with the Tribal Representative to mitigate or avoid any significant impacts to identified tribal cultural resources. Absent an agreement with the Tribal Representative, as provided in Public Resources Code Section 21083.2, the find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur until testing or studies prepared by a Qualified Archaeologist have adequately documented the recovery of scientifically consequential information from and about the resource. Construction activity may continue unimpeded on other portions of the project site if cleared by the Qualified Tribal Monitor or Qualified Archaeologist. Ground Disturbance Activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist.</i> <i>The measure shall be shown on plans.</i>
Wildfire		
4.17-1: Hillside Construction Staging and Parking Plan	No	Applicable to discretionary projects located in or adjacent to an SRA or VHFHSZ, where LAFD finds it necessary to add additional conditions above existing regulations to reduce the risk of construction-related activities impairing an emergency response plan or emergency evacuation plan. Requires submission of a Construction Staging and Parking Plan to the Department of Building and Safety and LAFD for review and approval. The Project is within the VHFHSZ and would comply with all appropriate building code and regulatory requirements regarding maintaining adequate access for emergency vehicles and no impairment of evacuation or emergency response routes. As discussed relative to Mitigation Measure 4.12-1(a), LAFD has reviewed and approved the architectural Project plans and did not require any additional studies or require mitigation measures be implemented. Also, as discussed relative to Mitigation Measure 4.14-1, LADOT has reviewed the Project and does not find that a study is necessary or that compliance with existing regulations would not be adequate. Therefore, this measure is not applicable to the Project.

Mitigation Measure	Applicable to Mount Holyoke Project?	Notes
4.17-3: Undergrounding of Power Lines in and Near an SRA and VHFHSZs	Yes	Applicable to all discretionary applications for development located in or within one mile of an SRA or VHFHSZ that involve the installation of new power lines. Requires new power lines to be located underground. Prior to issuance of grading or building permits, the applicant shall submit plans for undergrounding power lines. The Project requires new power connections for the proposed residence. Therefore, this measure is applicable to the Project. The applicant shall ensure that the undergrounding of power lines is reflected in all project plans. <i>All Projects in or within one mile of an SRA or VHFHSZs, that involve or require the installation of new power lines shall be required to install the new power line underground. Prior to the issuance of a grading or building permit, the applicant shall submit plans for undergrounding of power lines.</i>

References

- ¹ England|Ecology. 2026 (June 24). *Biological Resources Report. Subject Property: APN: 4412015011. 425 N Mount Holyoke Ave.* Report originally prepared May 29, 2024. Updated in 2026 to note that report was prepared to the January 2025 Palisades Fire and evaluated ore-fire conditions.
- ² England|Ecology. 2026 (June 24). Letter report discussing the post-fire site conditions at 425 N. Mount Holyoke Avenue.
- ³ The Tree Resource. 2024 (November). *Tree Report for 425 N. Mount Holyoke Avenue, Los Angeles, California 90272.*
- ⁴ Langan. 2026 (August 21). Memorandum from Heather McDaniel McDevitt, RPA and Seth Wulkan of Langan to Kathleen King of the City of Los Angeles regarding CEQA Cultural Resources Compliance Response to Comment.
- ⁵ Langan. 2026 (August). *Archaeological, Paleontological, and Tribal Cultural Resources Assessment Report for the 425 Mount Holyoke Avenue Project Pacific Palisades, California.*
- ⁶ Langan. 2026 (August). *Archaeological, Paleontological, and Tribal Cultural Resources Assessment Report for the 425 Mount Holyoke Avenue Project Pacific Palisades, California.*
- ⁷ SWRCB (State Water Resources Control Board). 2024. Geotracker Data for 425 N. Mount Holyoke Avenue. Accessed on November 21, 2024. <https://geotracker.waterboards.ca.gov/map/>
- ⁸ DTSC (California Department of Toxic Substances Control). 2024. Envirostor Data for 425 N. Mount Holyoke Avenue. Accessed on November 22, 2024. <https://www.envirostor.dtsc.ca.gov/public>
- ⁹ Sespe Consulting. 2026 (August 11). Mount Holyoke Residence Project Noise Study Letter Report.
- ¹⁰ City of Los Angeles. 2024. VMT Calculator Version 1.4. Calculations for 425 N. Mount Holyoke Avenue. Available: <https://ladot.lacity.org/businesses/development-review>.
- ¹¹ LADOT. 2020. Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines. July 2020. Accessed July 16, 2020. https://ladot.lacity.org/sites/default/files/2020-07/ta_guidelines_all-sections_2020.07.04_attachments.pdf