

CHAPTER 4

MITIGATION MONITORING PROGRAM

1. Introduction

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State California Environmental Quality Act (CEQA) Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the CEQA Guidelines.

The City of Los Angeles (City) is the Lead Agency for the Project and is therefore responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures are completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts in the EIR takes into consideration the project design features (PDFs) and applies mitigation measures (MMs) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

2. Organization

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with an accompanying identification of the following:

- Enforcement Agency: The agency with the power to enforce the PDF or MM.
- Monitoring Agency: The agency to which reports involving feasibility, compliance, implementation and development are made.
- Monitoring Phase: The phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency: The frequency at which the PDF or MM shall be monitored.
- Action Indicating Compliance: The action of which the Enforcement or Monitoring Agency indicates that compliance with the required PDF or MM has been implemented.

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3. Administrative Procedures and Enforcement

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant, the election of which is in the sole discretion of the Applicant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately notify the Applicant of any non-compliance with PDFs and MMs. If the Applicant does not correct the non-compliance within two days from the time of notification, the Construction Monitor shall be obligated to report such non-compliance to the Enforcement Agency. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

4. Program Modification

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with the PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted if the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, finds that the modification or deletion complies with CEQA (including CEQA Guidelines Sections 15162 and 15164). This could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modification to or deletion of the PDF or MM. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or other basis for modifying or deleting the PDF or MM. Under this process, the modification or deletion of a PDF or MM shall not in and of itself require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5. Mitigation Monitoring Program

A. Aesthetics

Project Design Features

AES-PDF-1: Construction Fencing. The Project's security fencing along the W. 11th Street, S. Olive Street, and the mid-block alley perimeters of the Project will be designed to screen views to the Project Site's ground levels during construction. The fencing shall have a minimum height of 8 feet; and the Applicant shall ensure through appropriate postings and regular visual inspections that no unauthorized materials are posted on temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a reasonable manner throughout the construction period.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections during construction
- **Action Indicating Compliance:** Field inspection sign-off

AES-PDF-2: Parking Shielding: Podium parking will be shielded from adjacent areas with minimum 36-inch high baffling panels behind architectural screen meshing for aesthetic character as well as for light and sound attenuation.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

B. Air Quality

Project Design Features

AQ-PDF-1: Green Building Features: The Project will be designed to achieve the equivalent of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification level for new buildings. The Project will demonstrate compliance with the LEED Gold Certification or equivalent by providing architectural and engineering documentation, building energy modeling simulations, and other supporting evidence consistent with USGBC accepted documentation standards. Pre-construction documentation that indicates the Project is designed to achieve the number of points required for LEED Gold Certification will be provided to the City prior to building permit issuance. Post-construction documentation that indicates the Project operates within the expected parameters to achieve the number of points

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required for LEED Gold Certification will be provided to the City after completion of commissioning activities. A summary of key green building and LEED measures are provided below:

- The Project will implement a construction waste management plan to recycle and/or salvage a minimum of 65 percent of nonhazardous construction debris.
- The Project will incorporate heat island reduction strategies for 50 percent of the site hardscapes or provide 100 percent structured parking and incorporate heat island reduction strategies, including but not limited to high-reflectance and vegetated roofs, for the Project roof areas.
- The Project shall include at least twenty (20) percent of the total code required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Of the 20 percent EV Ready, five (5) percent of the total code required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the 20 percent or 5 percent results in a fractional space, round up to the next whole number. A label stating “EV CAPABLE” shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.
- The Project will optimize building energy performance including, but not limited to, installing energy efficient appliances.
- The Project will reduce water consumption by 40 percent for indoor water and 50 percent for outdoor water compared to baseline water consumption. Water reduction strategies include, but are not limited to planting drought-tolerant/California native plant species, increasing irrigation system efficiency, incorporating alternative water supplies (e.g., stormwater retention for use in landscaping), and/or installing smart irrigation systems (e.g., weather-based controls).
- The Project will provide on-site recycling areas with containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers.
- The residential units within the Project will not include the use of natural gas-fueled fireplaces.
 - **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
 - **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Operation
 - **Monitoring Frequency:** Once at Project plan check prior to issuance of building permit; Once after completion of LEED Gold Certification commissioning activities

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- **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; Post-construction documentation that indicates the Project operates within the expected parameters to achieve the number of points required for LEED Gold Certification

AQ-PDF-2: Construction Equipment Features: The Applicant will implement the following construction equipment features for equipment operating at the Project Site. These features will be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features will include the following:

- During plan check, the Project representative will make available to the lead agency and the South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used during any of the construction phases. The inventory will include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, Best Available Control Technology (BACT) documentation, and California Air Resources Board (CARB) or SCAQMD operating permit shall be provided on-site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment that will be used an aggregate of 40 or more hours during any portion of the construction activities associated with grading/excavation/export phase must meet the Tier 4 Final standards. Construction contractors supplying heavy duty diesel equipment greater than 50 horsepower will be encouraged to apply for SCAQMD Surplus Off-Road Opt-In for NO_x (SOON) funds. Information including the SCAQMD website will be provided to each contractor which uses heavy duty diesel for on-site construction activities.
- Equipment such as tower cranes and signal boards must be electric or alternative-fueled (i.e., non-diesel). Pole power will be made available for use for electric tools, equipment, lighting, etc. Construction equipment such as tower cranes and signal boards must utilize electricity from power poles or alternative fuels (i.e., non-diesel), rather than diesel power generators and/or gasoline power generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment must be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.
- Alternative-fueled generators (e.g., natural gas, battery electric, solar, etc.) that generate less NO_x and particulate matter emissions when compared to equivalent diesel-fueled models will be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of the commercial availability of such equipment will be made by the City prior to the issuance of grading or building permits based on applicant-provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence obtained by the City from expert sources such as construction contractors in the region.
- Alternative-fueled sweepers/scrubbers shall be used pursuant to SCAQMD Rule 1186.1.
- Contractors will maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor must keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.

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- Construction activities must be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable will be maintained by the Contractor on-site.
 - **Enforcement Agency:** City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District
 - **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once during Project plan check; Continuous field inspections during construction, with quarterly reporting
 - **Action Indicating Compliance:** Issuance of applicable building permit; Field inspection sign-off

Mitigation Measures

AQ-MM-1: The Applicant shall implement the following measures to reduce the emissions of air pollutants generated by concrete trucks during the continuous concrete pouring phase lasting for approximately one day:

- a. The contractor shall use concrete trucks with an average capacity of 10 cubic yards to minimize the number of concrete truck trips;
- b. The contractor shall use local concrete suppliers with 90 percent or more of the concrete supplied by one or more facilities located within a driving distance of approximately 4.5 miles per one-way trip (approximately 9 miles per round trip) and the remaining 10 percent from one or more facilities located within a driving distance of approximately 9 miles per one-way trip (approximately 18 miles per round trip).
- c. The contractor shall be required to ensure that approximately 50 percent of the concrete truck trips, equivalent to approximately 19 concrete trucks per hour, are made by CNG-fueled concrete trucks or trucks that achieve the same or lower NO_x emissions as CNG-fueled concrete trucks.
- d. During plan check, the Project representative shall make available to the lead agency and SCAQMD a comprehensive inventory of all concrete trucks that will be used during the continuous approximately one-day concrete pouring phase. The inventory shall include the concrete truck capacity, fuel specification, and NO_x emissions rating. A copy of each such unit's certified emissions rating shall be provided on-site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified emissions specification.
 - **Enforcement Agency:** City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District
 - **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once during Project plan check; Continuous field inspections during construction, with quarterly reporting

- **Action Indicating Compliance:** Issuance of applicable building permit; Field inspection sign-off

C. Biological Resources

Mitigation Measures

MM-BIO-1: Prior to issuance of a grading permit, the Project Applicant shall demonstrate that the following requirements have been included in the Project construction plan:

- a. Any construction activities that occur during the nesting season (February 15 to August 31) shall require that all suitable habitat (i.e., street trees and shrubs) be surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Building and Safety, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City of Los Angeles Building and Safety.
- b. If the required pre-construction survey detects any active nests, an appropriate buffer as determined by the biological monitor, shall be delineated, flagged, and avoided to the extent feasible until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.
 - **Enforcement Agency:** City of Los Angeles Department of Building and Safety
 - **Monitoring Agency:** City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once prior to issuance of building permit; Periodic field inspection during construction
 - **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; Field inspection sign-off

D. Cultural Resources

Mitigation Measures

CULT-MM-1: Prior to the issuance of a demolition permit, the Applicant shall retain a Qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist). The Qualified Archaeologist will oversee an archaeological monitor who shall be present during construction activities on the Project Site, including demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The activities to be monitored shall also include off-site improvements in the vicinity of the Project Site, such as utility, sidewalk, or road improvements. The monitor shall have the authority to direct the pace of construction equipment in areas of higher sensitivity. 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 may be ceased entirely, if determined adequate by the Qualified Archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given to construction personnel at the pre-construction meeting and thereafter when new staff are added to the Project. The training session shall be carried out by the Qualified Archaeologist, will focus on how to identify archaeological resources that may be

encountered during earthmoving activities, and will discuss the procedures to be followed in such an event.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once prior to issuance of a demolition or grading permit; Periodically based on field inspections during construction, with quarterly reporting
- **Action Indicating Compliance:** Issuance of demolition or grading permit; Field inspection sign-off

CULT-MM-2: In the event that historic-period (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 shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work may continue outside of the buffer area. All archaeological resources unearthed by Project construction 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. If any prehistoric archaeological sites are encountered within the project area, consultation with interested Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of 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, analysis, and reporting. 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 or historical society in the area for educational purposes.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** At time of resource discovery, should it occur
- **Action Indicating Compliance:** Compliance report by qualified archaeologist

CULT-MM-3: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources. The report and the Site Forms shall be submitted by the Project applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; South Central Coastal Information Center
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, completion of grading/excavation activity
- **Action Indicating Compliance:** Compliance report by qualified archaeologist

CULT-MM-4: Although Project disturbance planned for ingress and egress to the Project Site and ancillary construction for utilities and other infrastructure related to the Project would result in mainly surficial excavation, if the Zanja is located where mapped, such construction has the potential to encounter the Zanja. The following recommendations would reduce impacts to the Zanja. If Zanja-related infrastructure is unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate exclusion area that takes into account the linear nature of the resource shall be established by the Qualified Archaeologist. Construction activities shall not be allowed to continue within the exclusion area until directed by the Qualified Archaeologist in consultation with the City, but work shall be allowed to continue outside of the exclusion area. The Qualified Archaeologist shall coordinate with the Applicant and the City's Office of Historic Resources to develop a formal treatment plan for the resource that would serve to mitigate impacts to the resource. The treatment measures listed in California Code of Regulations Section 15126.4(b) shall be considered when determining appropriate treatment for the Zanja. As noted in California Code of Regulations Section 15126.4(b)(A), preservation in place (i.e., avoidance) is the preferred manner of mitigating impacts to archaeological sites. If, in coordination with the City, it is determined that preservation in place is not feasible, other treatment measures for the resource shall be developed by the Qualified Archaeologist in coordination with the Office of Historic Resources and with final approval by the City. Treatment would be designed to address the resource's eligibility under Criterion 1 (significant events), Criterion 2 (important persons), Criterion 3 (type, period, region or method of construction), and Criterion 4 (scientific data) and may include implementation of: (1) data recovery excavations to document and remove the resource, followed by subsequent laboratory processing, analysis, and reporting; (2) a commemoration program that includes the development of an interpretive exhibit/display or plaque at the Project Site; and/or (3) other public educational and/or interpretive treatment measures determined appropriate by the Qualified Archaeologist in consultation with the City's Office of Historic Resources. Any associated artifacts collected that are not made part of the interpretive collection 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 materials, they shall be offered for donation to a local school or historical society for educational purposes.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** At time of resource discovery, should it occur
- **Action Indicating Compliance:** Compliance report by qualified archaeologist

CULT-MM-5: The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms for the Zanja resource. The report shall outline the treatment measures implemented, and shall include a description of the resource and the results of any artifact processing, analysis, and research that was conducted. The report and the Site Forms shall be submitted by the Qualified Archaeologist to the City and the South Central Coastal Information Center.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; South Central Coastal Information Center.
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, completion of grading/excavation activity
- **Action Indicating Compliance:** Compliance report by qualified archaeologist

E. Energy

Project Design Features

Refer to Project Design Features **AQ-PDF-1: Green Building Features**; and **WS-PDF-1: Water Conservation**.

F. Geology and Soils – Paleontological Resources

Mitigation Measures

GEOL-MM-1: A Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Prior to issuance of demolition or grading permit; Periodic during construction activities
- **Action Indicating Compliance:** Issuance of demolition or grading permit; Compliance report by qualified paleontologist

GEOL-MM-2: The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Prior to issuance of demolition or grading permit
- **Action Indicating Compliance:** Issuance of demolition or grading permit

GEOL-MM-3: Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the direction of the Qualified Paleontologist. Paleontological resources monitoring shall be conducted for all ground disturbing activities that exceed 15 feet in depth in previously undisturbed older Alluvial sediments which have high sensitivity for encountering paleontological resources. However, depending on the conditions encountered, full-time monitoring within these sediments can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Paleontologist. The surficial Alluvium has low paleontological sensitivity and so work in the upper 15 feet of the Project Site does not require monitoring. The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring should be revised based on his/her observations. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic
- **Action Indicating Compliance:** Compliance report by qualified paleontologist

GEOL-MM-4: Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition will be included with the final report which will be submitted to the appropriate repository and the City.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** At time of resource discovery, should it occur; end of excavation/grading activities
- **Action Indicating Compliance:** Compliance report by qualified paleontologist

G. Greenhouse Gas Emissions

Project Design Features

Also refer to Project Design Features **AQ-PDF-1, Green Building Features;** and **WS-PDF-1 Water Conservation Features.**

GHG-PDF-1: GHG Emission Offsets: The Project will provide or obtain GHG emission offsets as required as described in the Project's Environmental Leadership Development Project certification and related documentation pursuant to the *Jobs and Economic Improvement Through Environmental Leadership Act*. Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall commit to entering into one or more contracts to purchase carbon credits from a recognized and reputable carbon registry (to be selected from an accredited registry), which contract, together with any previous contracts for the purchase of carbon credits, shall evidence the purchase of carbon credits in an amount sufficient to offset the Operational Emissions attributable to the Project, and shall be calculated on a net present value basis for a 30-year useful life.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning; California Air Resources Board
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, prior to issuance to Certificate of Occupancy
- **Action Indicating Compliance:** Completion of purchase contract

H. Hazards and Hazardous Materials

Project Design Features

Refer to Project Design Feature **TRAF-PDF-1: Construction Management Plan.**

Mitigation Measures

HAZ-MM-1: Soil Management Plan: A Soil Management Plan (SMP) shall be prepared that would provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils from historical operations that may be encountered at the Project Site during grading and excavation activities. These procedures would include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures. The SMP shall also contain procedures to be followed in the event that undocumented subsurface features of potential environmental concern (e.g., USTs, abandoned oil wells, sumps, hydraulic lifts, clarifiers, buried drums) are encountered during the excavation grading, and/or other earthmoving activities. These procedures would include safety training, testing protocols, decontamination and decommission standards, and notification to the appropriate relevant regulatory oversight agency or agencies.

The SMP would also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses, religious uses, and schools. In accordance with SCAQMD Rule 1166 requirements, impacted soil removed from the Project Site shall comply with the following:

- Be transported to an approved treatment/disposal facility.
- When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer.
- Prior to covering/tarping, loaded impacted soil shall be wetted by spraying with dust inhibitors.
- The trucks or trailers shall be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
- The exterior of the trucks (including the tires) shall be cleaned off prior to the trucks leaving the excavation location.
 - **Enforcement Agency:** City of Los Angeles Department of Building and Safety
 - **Monitoring Agency:** City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction, Construction
 - **Monitoring Frequency:** Once at Project plan check prior to issuance of grading permit; Ongoing with periodic field inspections during construction if impacted material is discovered
 - **Action Indicating Compliance:** Issuance of grading permit; Field inspection signoff

HAZ-MM-2: USTs: For earthwork activities occurring within the sidewalk in the vicinity of West 11 Street and South Olive Street, potholing prior to construction is recommended to assess if a UST is present and to reduce the potential for construction delays. If a UST is identified, a tank removal permit and oversight of the removal shall be submitted to the Los Angeles Fire Department.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Fire Department

- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Fire Department
- **Monitoring Phase:** Pre-construction, Construction if tank removal is required
- **Monitoring Frequency:** Once at Project plan check prior to issuance of grading permit; Once at completion of tank removal should such be required
- **Action Indicating Compliance:** Issuance of grading permit; Field inspection signoff

I. Noise

Project Design Features

Also refer to Project Design Feature **AES-PDF-2: Parking Shielding.**

NOISE-PDF-1: The Project will not use impact pile drivers and will not allow blasting during construction activities.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

NOISE-PDF-2: Signs will be posted at Project truck loading areas prohibiting idling for more than 5 consecutive minutes.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

NOISE-PDF-3: Amplified sound in outdoor open space areas on the site shall be prohibited.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction; Operation
- **Monitoring Frequency:** Once during field inspection; Periodic if needed
- **Action Indicating Compliance:** Issuance of Certificate of Occupancy; Field inspection signoff

Mitigation Measures

Also Refer to Mitigation Measures **CULT-MM-4 through CULT-MM-5.**

NOISE-MM-1: The Project shall provide temporary ground-level construction fencing equipped with noise blankets rated to achieve sound level reductions of at least 10 dBA between the Project Site and the ground-level noise sensitive receptors at sensitive receptor locations R1 (mixed-use residential north of the Project Site) and R2 (mixed-use residential west of the Project Site). These temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptor during early Project construction phases (up to the start of framing) when the use of noisy heavy equipment such as concrete saws, crawler tractors, and drill rigs, is prevalent.

Noise barriers shall be heavy-duty materials such as vinyl-coated polyester (VCP), at least 10 ounces per square yard and quilted for sound absorption, or other similarly effective materials. All noise barrier material types are equally effective, acoustically, if they have this density. The noise barrier shall have a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 or equivalent STC and NRC to achieve the 10 dBA reduction. STC is an integer rating of how well a wall attenuates airborne sound and NRC is a scalar representation of the amount of sound energy absorbed upon striking a wall.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Periodic field inspections
- **Action Indicating Compliance:** Plan approval and issuance of applicable demolition or building permit; Field inspection sign-offs

NOISE-MM-2: During framing and vertical building construction, the Project shall provide temporary flexible noise curtains or noise blankets along the Project's vertical structures rated to achieve sound level reductions of at least 10 dBA to block the line-of-sight between noise producing equipment and the adjacent residential land uses at sensitive receptor locations R1 (mixed-use residential north of the Project Site) and R2 (mixed-use residential west of the Project Site), where the use of such noise curtains or noise blankets would not interfere with the safety, integrity, and necessary construction activities of framing and vertical building construction.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Periodic field inspections
- **Action Indicating Compliance:** Plan approval and issuance of applicable demolition or building permit; Field inspection sign-offs

NOISE-MM-3: Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The contractor shall use muffler systems (e.g. absorptive mufflers)

that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-offs

NOISE-MM-4: The operation of construction equipment that generates high levels of vibration, such as large bulldozers and loaded trucks, shall be prohibited within 80 feet of the property lines of existing residential uses adjacent to the Project Site. Instead, rubber-tired equipment not exceeding 400 horsepower shall be used in these areas during demolition, grading, and excavation operations within 80 feet from the sensitive receptor locations R1 (mixed-use residential north of the Project Site) and R2 (mixed-use residential west of the Project Site).

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-offs

NOISE-MM-5: To reduce potential construction noise impacts and vibration impacts regarding human annoyance, the Applicant shall designate a construction relations officer to serve as a liaison with the adjacent mixed-use developments (R1 and R2). The liaison shall be responsible for responding to concerns regarding construction noise and vibration within 24 hours of receiving a complaint. The liaison shall ensure that steps will be taken to reduce construction noise and vibration levels as deemed appropriate and safe by the on-site construction manager. Such steps could include the use of noise absorbing curtains or blankets, vibration absorbing barriers, substituting lower noise or vibration generating equipment or activity, rescheduling of high noise or vibration-generating construction activity, or other potential adjustments to the construction program to reduce noise or vibration levels at the adjacent mixed-use developments (sensitive receptor locations R1 [mixed-use residential north of the Project Site] and R2 [mixed-use residential west of the Project Site]).

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-offs

NOISE-MM-6: The Project shall provide a construction site notice that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for

the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction, Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-offs

J. Fire Protection

Project Design Features

Refer to Project Design Feature **TRAF-PDF-1: Construction Management Plan.**

K. Police Protection

Project Design Features

Also refer to Project Design Features **TRAF-PDF-1: Construction Management Plan; and TRAF-PDF-2: Pedestrian Safety Plan.**

POL-PDF-1: Construction Security Measures. During construction, on-site security measures will be incorporated, specifically: an eight-foot tall construction security fence, with gated and locked entry; controlled access, multiple security surveillance cameras, and 24-hour private construction security services.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Police Department
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Police Department
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-offs

POL-PDF-2: Provision of Project Diagrams to LAPD: Prior to the issuance of a building permit, the Applicant will provide the Los Angeles Police Department (LAPD) Central Area Commanding Officer with a diagram of the Project Site, including access routes, gate access codes, and additional information, to facilitate potential LAPD responses once the Project is operating.

- **Enforcement Agency:** City of Los Angeles Department of City Planning, Los Angeles Police Department
- **Monitoring Agency:** City of Los Angeles Department of City Planning, Los Angeles Police Department
- **Monitoring Phase:** Pre-construction; Construction

- **Monitoring Frequency:** Once prior to issuance of building permit; Once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Compliance documentation of diagram submittal to LAPD, and issuance of applicable demolition or building permit; Issuance of Certificate of Occupancy

POL-PDF-3: On-Site Operational Security Measures. On-site security measures during Project operation will incorporate strategies from Crime Prevention through Environmental Design (CPTED) and include:

- Secured building access/design to residential areas (electronic keys specific to each user);
- Lighting of building entryways and Plaza areas;
- Staff training in safety and sound security policies;
- 24-hour video surveillance;
- Trained 24-hour security personnel (providing assistance to residents and visitors with Site access; monitoring entrances and exits of the building; managing and monitoring fire/life/safety systems; and patrolling the Project Site, including parking areas).
- Installation and utilization of an extensive security camera network, with approximately 40-50 cameras throughout the underground and above-grade parking structure; the elevators; the common and amenity spaces; the lobby areas; and the rooftop and ground level outdoor open spaces;
- Maintaining all security camera footage for at least 30 days, and providing such footage to LAPD as needed; and
- Maintaining approximately 30-40 staff on-site, including 24 hours at the lobby concierge desk and within the car valet areas, with designated staffers dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed.
 - **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Police Department
 - **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Police Department
 - **Monitoring Phase:** Pre-Construction; Operations
 - **Monitoring Frequency:** Once prior to building permit approval; Periodically during operations
 - **Action Indicating Compliance:** Approval of Site Plan

L. Transportation and Traffic

Project Design Features

TRAF-PDF-1: Construction Management Plan: A Construction Traffic Management Plan shall be prepared for approval by the City prior to the issuance of any construction permits, to incorporate the measures identified below, as well as a Worksite Traffic Control Plan specifying the details of any sidewalk or lane closures. The Worksite Traffic Control Plan will be developed by the Applicant, and will identify all traffic control measures, signs, delineators, and work

instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The Worksite Traffic Control Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists and pedestrians. The plan will be reviewed and approved by LADOT prior to commencement of construction and will include, but not limited to, the following elements as appropriate:

- Maintain access for land uses in the vicinity of the Project site during construction.
- Schedule construction material deliveries to off-peak periods to the extent possible.
- Minimize obstruction of traffic lanes on Olive Street and 11th Street adjacent to the Project Site.
- Organize site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways,
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the site and impact roadway traffic. If needed, utilize an organized off-site staging area. Off-site staging areas shall be identified at an area that would avoid impacts to on-street parking or neighborhoods.
- Control truck and vehicle access to the Project Site with flagmen.
- Sidewalk access on Olive Street and 11th Street will be maintained during construction through the use of covered protective walkways. A Worksite Traffic Control Plan will be prepared for approval by the City, to facilitate pedestrian and traffic and movement, in order to minimize any potential conflicts.
- Coordinate with the City, emergency service providers, neighboring property management, and surrounding construction related project representatives (i.e., construction contractors) whose projects would potentially be under construction at around the same time as the Project to ensure adequate access is maintained to the Project Site and neighboring properties. Meetings shall be conducted bimonthly, or as otherwise determined appropriate by City Staff.
- Parking for construction workers will be provided off-site in off-street locations. Parking will not be allowed on streets in the vicinity of the Project.
 - **Enforcement Agency:** City of Los Angeles Department of Transportation
 - **Monitoring Agency:** City of Los Angeles Department of Transportation; Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once prior to issuance of demolition or grading permit; Periodic field inspections
 - **Action Indicating Compliance:** Approval of Construction Traffic Management Plan from the Los Angeles Department of Transportation prior to issuance of demolition or grading permit; Field inspection sign-offs

TRAF-PDF-2: Pedestrian Safety Plan: The Applicant shall plan construction and construction staging so as to maintain pedestrian access, including Safe Routes to Schools, on adjacent sidewalks throughout all construction phases. The Applicant will maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to

sidewalk closure or blockage, at all times. Temporary pedestrian facilities will be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways will be provided where pedestrians are exposed to potential injury from falling objects. The Applicant will keep sidewalks open during construction except when it is absolutely required to close or block the sidewalks for construction staging. Sidewalks will be reopened as soon as reasonably feasible, taking construction and construction staging into account. In the event that multiple projects are under construction in the area simultaneously that would affect the same sidewalk(s), the Applicant shall coordinate with LADOT to ensure pedestrian safety along the sidewalks is maintained in the immediate vicinity around the Project Site.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once prior to issuance of demolition or grading permit; Periodic field inspections
- **Action Indicating Compliance:** Approval of Construction Pedestrian Safety Plan from the Los Angeles Department of Transportation prior to issuance of demolition or grading permit; Field inspection signoffs

Mitigation Measures

TRAF-MM-1: Transportation Demand Management (TDM) Program: The Project shall implement a TDM program to encourage the use of non-auto modes of transportation and reduce vehicle trips. A preliminary TDM program shall be prepared and provided for LADOT review prior to the issuance of the first building permit for the Project and a final TDM program shall be approved by DOT prior to the issuance of the first certificate of occupancy. The preliminary plan shall include, at a minimum, measures consistent with the City's Trip Reduction Ordinance. As recommended by the Project's Transportation Study, the TDM program shall include, but not be limited to the following strategies:

- Promotion and support of carpools and rideshares, including parking and transit incentives;
- Preferential parking for carpools and vanpools for employees;
- Provide on-site real-time information displays to make available real-time information on car-sharing, transit, vanpools, taxis;
- Transit Welcome Package – to all new residents/employees with info on alternate modes and walk to destination opportunities;
- Unbundling of residential parking;
- Participate in a Car-Share Program to provide vehicle spaces for car share vehicles;
- Provide access to collapsible shopping carts and/or cargo bike for ease of local shopping;
- Provide discounts for employees who utilize public transit to travel from the project site;
- On-site bicycle amenities such as access to free bicycles for residential guests, on-site repair station and bicycle racks, and lockers/showers for residents and employees;

- Provide a free bike share service for residents;
- Participate in the City's Bike Share Program by providing an area for bike share facility
- A one-time fixed-fee contribution of \$75,000 to be deposited into the City's Bicycle Plan Trust Fund prior to the issuance of any certificates of occupancy to be used to implement bicycle improvements within the Project area;
- Make a one-time financial contribution of \$75,000 to the City of Los Angeles Department of Transportation for the implementation of First and Last Mile transit access measures in the vicinity of the project site;
- Ridesharing Services Program which would match employees together to establish carpools and vanpools;
- Record a Covenant and Agreement to ensure that the TDM program will be maintained.

In order to assess the Project's actual trip generation and any subsequent TDM Plan (if deemed necessary), a traffic monitoring plan shall be implemented once the Project is built and occupied to equilibrium (i.e., the level at which the owner/management deems maximum occupancy). The monitoring program shall be conducted annually to ensure compliance for a period of three years. If the Project is found to not conform to the trip reduction targets of 30 trips in the AM peak hour and 33 trips during the afternoon peak hour, the Project shall have an additional year to meet the trip reduction levels. If the Project continues to not meet the TDM goals, the City and Project staff shall cooperate on implementing further TDM Strategies. The final traffic monitoring plan and TDM Plan shall be prepared for and approved by the LADOT prior to the issuance of the first certificate of occupancy for the Project.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
- **Monitoring Phase:** Once prior to occupancy
- **Monitoring Frequency:** Once prior to issuance of building permit approval; Once prior to Certificate of Occupancy; and Annually for three years of operation.
- **Action Indicating Compliance:** Los Angeles Department of Transportation approval of TDM program; issuance of Certificate of Occupancy; and Approval of compliance reports

TRAF-MM-2: Transportation System Management (TSM) Improvements. The Project shall contribute up to \$100,000 toward TSM improvements to intersections within the vicinity of the Project that may be considered to better accommodate intersection operations and increase intersection capacity throughout the Project's Transportation Study area.

A final determination on how to implement the TSM improvements will be made by LADOT prior to the issuance of the first building permit. These TSM improvements shall be implemented either by the Applicant through the B-Permit process of the Bureau of Engineering (BOE), or through payment of a one-time fixed fee of \$100,000 to LADOT to fund the cost of the upgrades.

- If LADOT selects the payment option, then the Applicant shall pay \$100,000 to LADOT, and LADOT shall design and construct the upgrades.
- If the upgrades are implemented by the Applicant through the B-Permit process, then these TSM improvements shall be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the Applicant, provided that, in each case, the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.
 - **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Bureau of Engineering.
 - **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
 - **Monitoring Phase:** Pre-Construction, Construction
 - **Monitoring Frequency:** Once prior to issuance of building permit approval; Once prior to Certificate of Occupancy.
 - **Action Indicating Compliance:** Los Angeles Department of Transportation receipt of payment or Bureau of Engineering B-permit guarantee from Applicant; Issuance of Certificate of Occupancy

M. Wastewater

Project Design Features

Refer to Project Design Feature **WS-PDF-1: Water Conservation Features**.

N. Water Supply

Project Design Features

WS-PDF-1: Water Conservation Features: The Project shall implement the following water conservation features that are in addition to those required by codes and ordinances:

- High Efficiency Toilets with a flush volume of 1 gallon per flush, or less
- Urinal flush volumes of 1.0 gallons per minute, or less
- Showerheads with a flow rate of 1.2 gallons per minute, or less
- ENERGY STAR Certified Residential Clothes Washers - Front-loading or Top-loading with Integrated Water Factor of 3.2 or less and capacity of 4.5 cubic feet
- ENERGY STAR Certified Residential Dishwashers - compact with 3 gallons/cycle or less
- Domestic Water Heating System located close proximity to point(s) of use
- Individual metering and billing for water use for every residential dwelling unit and commercial unit
- Tankless and on-demand Water Heaters
- Water-Saving Pool Filter
- Pool/Spa recirculating filtration equipment

- Pool splash troughs around the perimeter that drain back into the pool
- Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
- Reuse pool backwash for irrigation
- Leak Detection System for swimming pools and Jacuzzi
- Drip/Subsurface Irrigation (Micro-Irrigation)
- Micro-Spray
- Proper Hydro-zoning/Zoned Irrigation - (groups, plants with similar water requirements together)
- Artificial Turf
- Drought Tolerant Plants - approximately 70 percent of landscaping
- Water Conserving turf - approximately 30 percent of total landscaping
 - **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Water and Power
 - **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once at Project plan check prior to issuance of building permit; Once prior to issuance of final Certificate of Occupancy
 - **Action Indicating Compliance:** Approval of plans and issuance of applicable building permit; Issuance of Certificate of Occupancy