

EXHIBIT C MITIGATION MONITORING PROGRAM

CPC-2017-1014-CU-ZAA-SPR;
ENV-2017-1015-EIR

IV. Mitigation Monitoring Program

1. Introduction

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

The City of Los Angeles (City) is the Lead Agency for the Project and therefore is 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 have been 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 takes into consideration the project design features (PDF) and applies mitigation measures (MM) 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. Purpose

It is the intent of this MMP to:

1. Verify compliance with the PDFs and MMs identified in the EIR;
2. Provide a framework to document implementation of the identified PDFs and MMs;
3. Provide a record of mitigation requirements;
4. Identify monitoring and enforcement agencies;
5. Establish and clarify administrative procedures for the clearance of PDFs and MMs;
6. Establish the frequency and duration of monitoring; and
7. Utilize the existing agency review processes wherever feasible.

3. Organization

As shown on the following pages, each identified PDF and MM 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(s) Indicating Compliance:** the action(s) of which the enforcement or monitoring agency indicates that compliance with the identified PDF or MM has been implemented.

4. 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 verification, 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 listed below. 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), 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 report to the Enforcement Agency any non-compliance with MMs and PDFs within two (2) businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

5. 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. This 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 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 as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, Sections 15162 and 15164, including by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM. Under this process, the modification or deletion of a PDF or MM shall not require a modification to any project discretionary approval unless the Director of Planning also finds that the change to the PDFs or MMs results in a substantial change to the Project or the non-environmental conditions of approval.

6. Mitigation Monitoring Program

A. Aesthetics

(1) Project Design Features

AES-PDF-1 Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity from view at the street level.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to grading, construction, and/or building permit approvals.
- **Monitoring Frequency:** Ongoing during construction and field inspections
- **Action(s) Indicating Compliance:** Issuance of grading, construction, and/or building permit; Field inspection sign-off

AES-PDF-2 Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent residential properties, the public right-of-way, or from the above. However, construction lighting will not be so limited as to compromise the safety of construction workers.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to grading, construction, and/or building permit approvals
- **Monitoring Frequency:** Ongoing during construction and field inspections
- **Action(s) Indicating Compliance:** Issuance of grading, construction, and/or building permit; Field inspection sign-off

AES-PDF-3 Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning (HVAC) systems), as well as building appurtenances, and trash enclosures, will be integrated into the Project's architectural design.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

AES-PDF-4 All new outdoor lighting required for the Project will be shielded and directed towards the interior of the Project Site such that the light source does not project directly upon any adjacent property.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

AES-PDF-5 Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare by minimizing the use of glass

with mirror coating. Consistent with applicable energy and building code requirements, glass with coatings required to meet the current Building Energy Efficiency Standards will be permitted.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

AES-PDF-6 The Project Applicant will be responsible for the maintenance of all trees on the Project Site and the immediately adjacent street trees planted as part of the Project, including the replacement of any tree that does not survive the initial transplant or that dies or is severely damaged during the life of the tree.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Periodic field inspections
- **Action(s) Indicating Compliance:** Field-inspection sign-off; Compliance report by Applicant

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

B. Air Quality

(1) Project Design Features

AQ-PDF-1 The Project will install a minimum of 20 electric vehicle charging stations for electric passenger vehicles with an additional 38 stalls capable of supporting future electric vehicle chargers.

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

- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

AQ-PDF-2 The Project will include at least six tractor trailer parking stalls capable of supporting future electric vehicle supply equipment.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

AQ-PDF-3 The Project will install a solar photovoltaic (PV) system to offset energy demands of the office portion of the use, which would generate a minimum of 460,000 kilowatt-hours per year (kWh/yr) of renewable electricity.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

AQ-PDF-4 The proposed building will be designed and built to meet the standard for LEED Silver Certification under either the (1) LEED v.4 Building Design and Construction Standards for Core and Shell Development set forth by the U.S. Green Building Council or (2) LEED pre-certified Prologis program.

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

- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

AQ-PDF-5 All forklifts used on-site will be electric-powered. This requirement shall be listed and enforced through the Air Quality Operational Implementation Plan listed as AQ-MM-9.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Periodic
- **Action(s) Indicating Compliance:** Compliance with AQ-MM-9

AQ-PDF-6 The Project will install a roof with a Solar Reflectance Index (SRI) of 25 or better to reduce surface temperature, heat island effect, and heat transfer to the interior of the structure.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

(2) Mitigation Measures

AQ-MM-1 During construction, the construction contractor shall, at minimum, use paints with a volatile organic compound (VOC) content of 25 grams per liter or less for all interior and exterior building coatings. This mitigation measure shall be noted on all construction plans verified by the City of Los Angeles Department of Building and Safety and Department of City Planning prior to issuance of any construction permits and during coating activities.

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

- **Monitoring Phase:** Prior to construction and/or building permit issuance
- **Monitoring Frequency:** Prior to issuance of construction and/or building permits and during coating activities
- **Action(s) Indicating Compliance:** Issuance of construction and/or permits; Field inspection sign-off

AQ-MM-2

During construction, the construction contractor shall, at minimum, use paints with a volatile organic compound (VOC) content of 50 grams per liter or less for all surface parking lot striping. This mitigation measure shall be noted on all construction management plans verified by the City of Los Angeles Department of Building and Safety and Department of City Planning prior to issuance of any construction permits and during parking lot coating activities.

- **Enforcement Agency:** Los Angeles Department of Building and Safety; Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to construction and/or building permit issuance
- **Monitoring Frequency:** Prior to issuance of construction and/or building permits and during parking lot coating activities
- **Action(s) Indicating Compliance:** Issuance of construction and/or building permits; Field inspection sign-off

AQ-MM-3

Only electric-powered off-road equipment (e.g., yard trucks/hostlers) shall be utilized on-site for daily warehouse and business operations. The Project developer/facility owner shall disclose this mitigation measure to all tenants/business entities prior to the signing of any lease agreement. In addition, the limitation to use only electric-powered off-road equipment shall be included in all leasing agreements. This AQ-MM-3 requirement shall be implemented and included in the Air Quality Operational Implementation Plan identified in AQ-MM-9.

- **Enforcement Agency:** Los Angeles Department of City Planning; Office of Finance
- **Monitoring Agency:** Los Angeles Department of City Planning; Office of Finance
- **Monitoring Phase:** Operation

- **Monitoring Frequency:** Prior to issuance of any building permits
- **Action(s) Indicating Compliance:** Compliance with AQ-MM-9

AQ-MM-4

To reduce idling emissions from transport trucks, signage shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations (e.g., Rule 2485). At minimum, each sign shall include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict non-essential idling to no more than two consecutive minutes; and (3) telephone numbers of the building facilities manager, CARB, and South Coast Air Quality Management District to report violations. All signage shall be made of weather-proof materials. All site and architectural plans submitted to the City of Los Angeles Department of City Planning shall note the locations of these signs. Prior to issuance of a building permit, the final construction monitoring report shall include verification that signage has been installed.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of any building permits
- **Action(s) Indicating Compliance:** Verification through the final construction monitoring report; Issuance of a building permit

AQ-MM-5

All landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. This AQ-MM-5 requirement shall be implemented and included in the Air Quality Operational Implementation Plan identified in AQ-MM-9.

- **Enforcement Agency:** Los Angeles Department City Planning
- **Monitoring Agency:** Los Angeles Department City Planning
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Periodic field inspections
- **Action(s) Indicating Compliance:** Compliance with AQ-MM-9

AQ-MM-6 All transport trucks utilized for daily operations shall have engines that meet the California Air Resources Board's 2010 engine emissions standards specified in California Code of Regulations, Title 13, Article 4.5, Chapter 1, Section 2025 (i.e., 0.01 gram per brake horsepower-hour (g/bhp-hr) of particulate matter and 0.20 g/bhp-hr of NO_x emissions). The Project developer/facility owner shall disclose this mitigation measure to all tenants/business entities prior to the signing of any lease agreement. In addition, the aforementioned truck/engine requirement shall be included all leasing agreements. This AQ-MM-6 requirement shall be implemented and included in the Air Quality Operational Implementation Plan identified as AQ-MM-9.

- **Enforcement Agency:** Los Angeles Department of City Planning; Office of Finance
- **Monitoring Agency:** Los Angeles Department of City Planning; Office of Finance
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Prior to issuance of a any building permit
- **Action(s) Indicating Compliance:** Compliance with AQ-MM-9

AQ-MM-7 All emergency generators used for operation shall be powered by non-diesel fuel. This measure shall be implemented and included in the Air Quality Operational Implementation Plan identified in AQ-MM-9.

- **Enforcement Agency:** Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Prior to issuance of a building permit for the warehouse; Periodic field inspection
- **Action(s) Indicating Compliance:** Compliance with AQ-MM-9; Issuance of a building permit; Field inspection sign-off; Compliance report by Applicant

AQ-MM-8 The number of truck trips associated with the Project shall not exceed a Daily Trip Cap of 768 trips per day, consistent with the truck trip levels analyzed in the Project's Environmental Impact Report (ENV-2017-1015-EIR and SCH No. 2017121007). Prior to construction, the Project Applicant shall submit proof of retention of a licensed transportation consultant to the Department of City Planning. Prior to the issuance of building permits, the

Project Applicant shall develop a Truck Trip Monitoring Plan to the satisfaction of Los Angeles Department of Transportation and Department of City Planning. The Monitoring Plan shall be developed in consultation with the licensed transportation professional. The Monitoring Plan shall establish protocol for conducting monitoring of truck trips (e.g., appropriate software or equipment, placement of monitoring equipment, establishing protocol for addressing mechanical or human error, information on shifts, trips per shift, and operating hours, etc.), on-site circulation management strategies to maintain on-site safety, ensure idling restriction compliance, and ensure a safe and orderly pedestrian and vehicle environment when trucks enter and exit the public-right-of-way. The Monitoring Plan shall also identify staff responsible for on-site monitoring, and when truck trips reach 95% of the Daily Trip Cap or (729) trips; the plan shall include notification and management protocols to ensure compliance with the Daily Trip Cap. The Monitoring Plan shall also include protocols in the event the Daily Trip Cap is exceeded. Protocols shall include a process to notify the Department of City Planning of the exceedance, recommendations to reattain compliance with the established trip cap, and a subsequent California Environmental Quality Act (CEQA) review of the impacts (if any) resulting from the exceedance. The Monitoring Plan shall include documentation (e.g., a letter, advisory notice, or similar written documentation) confirming that the Project Applicant and/or future tenant will implement the Monitoring Plan during Project operation. During Project operation, the Project Applicant shall submit an annual report on compliance with the truck trip monitoring plan to the Department of City Planning and Los Angeles Department of Transportation, and within 15 days of a request for a report by the Department of City Planning or Los Angeles Department of Transportation; however, after the submission of five annual compliance reports, the reports shall be submitted to the Department of City Planning as requested. The Los Angeles Department of Transportation may at any time request and shall be granted permission to audit or observe the monitoring on site.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Transportation
- **Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Department of Transportation
- **Monitoring Phase:** Prior to construction and building permit issuance; Operation
- **Monitoring Frequency:** Prior to issuance of construction and building permits; Periodic field inspection

- **Action(s) Indicating Compliance:** City approval of proof of retention of a licensed transportation consultant and Truck Trip Monitoring Plan; Issuance of construction and building permits; Field inspection sign-off; Compliance report by Applicant

AQ-MM-9

Prior to issuance of any demolition, grading, or building permit the Applicant shall prepare and submit an Air Quality Operational Implementation Plan to the Department of City Planning for approval. The Air Quality Operational Implementation Plan shall demonstrate compliance with operational phase mitigation measures when no clear City processes for enforcement exists. The Air Quality Operational Implementation Plan shall document Mitigation Measures AQ-MM-3, and AQ-MM-5 through AQ-MM-8. For each measure the Air Quality Operational Implementation Plan shall document an operational implementation scheme, performance standards, monitoring (if applicable), contingencies for non-compliance, and implementation measures for any future change in tenant, ownership, and management.

- **Enforcement Agency:** Los Angeles Department of Building and Safety; Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to construction and/or building permit issuance
- **Monitoring Frequency:** Prior to issuance of construction and/or building permits
- **Action(s) Indicating Compliance:** Issuance of construction and/or permits; compliance with provisions of the Plan

AQ-MM-10

The Applicant/facility owner and tenant/business entity shall prepare an odor management plan for any use that has potential to generate nuisance odors beyond the property line (see list below or as determined by the City of Los Angeles Department of City Planning) which shall be implemented and included in the Air Quality Operational Implementation Plan identified in AQ-MM-9. Uses that have the potential to generate nuisance odors include, but are not limited to:

- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters

- Chemical-processing facilities
- Food-processing facilities

The odor management plan shall show compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors. The odor management plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be incorporated into the site plan and submitted to the City of Los Angeles Department of City Planning.

- **Enforcement Agency:** Los Angeles Department of City Planning; Office of Finance; South Coast Air Quality Management District
- **Monitoring Agency:** Los Angeles Department of City Planning; Office of Finance
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Prior to issuance of a Business License
- **Action(s) Indicating Compliance:** City approval of odor management plan; Verification through site plan; Issuance of a Business License

C. Cultural Resources

(1) Project Design Features

No PDFs are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

D. Energy

(1) Project Design Features

No PDFs are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

E. Geology and Soils

(1) Project Design Features

No PDFs are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

F. Greenhouse Gas Emissions

(1) Project Design Features

No PDFs are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

G. Hazards and Hazardous Materials

(1) Project Design Features

HAZ-PDF-1 The Project will implement the requirements of a Soil Management Plan (SMP) (see Appendix F3 of the Draft EIR) during soil moving activities, which includes explicit instructions for the appropriate handling, storage and disposal of any known or potentially impacted soil. The general contractor will be required to follow the requirements of the SMP and stop work to make notification to the environmental team if any potential impacts are observed at any time the environmental team is not already on-site. The SMP also requires air monitoring activities to monitor the air downwind of the Project Site and appropriate Health and Safety Plans that will be employed by site workers. The SMP identifies requirements intended to protect human health when soil in certain areas of known or suspected impacts are disturbed for any reason, including, but not limited to, those resulting from demolition, utility installation/repair, soil excavation, drilling, grading/filling activities, stockpile generation, soil management, loading, and transportation. Requirements of the SMP include:

- **Health and Safety Plan (HASP):** A HASP will be prepared and in effect for all activities associated with the SMP and other activities at the Project Site. Contractors working on site are expected to be operating under their own health and safety plans.

- **Environmental Monitoring:** In accordance with South Coast Air Quality Management District (SCAQMD) Rules, air monitoring will be necessary in areas where potential volatile organic compounds (VOC) contaminated soil are to be disturbed. Air monitoring for dust may also be required in other areas. An air monitoring/health and safety professional will be present during relevant activities and responsibilities will include recording monitoring data on field sheets, which will be kept as part of Project documentation.
- **Soil Monitoring:** Soils impacted by VOC or total petroleum hydrocarbons (TPH) that are encountered during site redevelopment will be characterized and documented. The monitoring and sampling activities to be performed include:
 - Visual observation performed to detect areas of soil that may be impacted by TPH or other non-VOC hazardous materials, if encountered.
 - Screening for VOCs using field instruments to document new or previously undetected sources of VOCs.
 - Soil sampling and chemical testing performed to evaluate concentrations of VOCs and TPH.
- **Proper Soil Handling:** If impacted soil is encountered, the area will be delineated as necessary with cones, caution tape, stakes, chalk, or flagging and the area will not be disturbed further until an environmental professional is on-site for observation and determination of whether testing and/or excavation work is required. Stockpile staging areas will be delineated prior to the start of excavation. All excavations will conform to applicable regulations, including the California Division of Occupational Safety and Health (Cal/OSHA) Construction Safety Orders. The specific equipment, means, and methods to be utilized for soil removal, handling, and disposition will be selected based on the nature of the work to be conducted and its location on the site. If excavation is conducted during the rainy season (October through April), provisions will need to be made to prevent off-site migration of sediment in runoff.
- **Fugitive Dust and Vapor Control:** Appropriate procedures will be implemented to control the generation of airborne dust by soil removal activities, including, but not limited to, the use of water as a dust suppressant or stopping activities that have the potential to generate fugitive dust in the event wind conditions change creating an uncontrollable condition.

- **Excavation and Stockpiling:** Impacted soil that is excavated and not immediately removed from the site will be stockpiled on site and covered with plastic sheeting to control dust and minimize exposure to precipitation and wind. If a stockpile remains on site during the rainy season, a perimeter sediment barrier, constructed of material such as straw bales or fiber roll, will also be installed. The stockpiles will be inspected biweekly at a minimum. During stockpile removal, only the working face of the stockpile will be uncovered. If the stockpiled impacted soil is to be transported off-site for disposal or recycling, the soil will be profiled for waste characteristics. Soil samples will be analyzed for parameters required by the disposal/recycling facility.
- **Responding to Unknown Conditions:** If previously unknown impacted soil is suspected (based on visual staining, odors, photo ionization detector readings, or other observations), the area will be delineated and construction activity will cease in this area and sampling of the unknown material will occur using United States Environmental Protection Agency (USEPA) methodology. Analysis will be conducted for TPH, metals, and/or VOCs, as appropriate. Analytical results will be compared to applicable regulatory screening levels. Based on this comparison, a determination will be made regarding soil disposition (reuse on site, off-site transport, and disposal/recycling, etc.). Additionally, if any underground storage tanks (UST) or other subsurface features are encountered, a similar approach will be taken, and appropriate permitting, as necessary, will be obtained for the removal of the feature(s). Any permitted removals will be conducted with appropriate regulatory oversight, documentation, and reporting.
- **Imported fill:** As appropriate, off-site soils brought to the site for use as backfill (import fill), if necessary, will be tested in general conformance with the California Department of Toxic Substances Control (DTSC) Information Advisory Clean Imported Fill Material document.
- **Post-construction Requirements:** If contaminated soil is left in place, the location of this soil will be surveyed or recorded by use of geographic positioning system equipment. Following the completion of construction, excavation, and disposition activities, a summary report will be prepared. The report will include a summary of activities, locations of soil sources and final disposition of contaminated soil, and estimated quantities of materials. Additionally, removal of any USTs or other subsurface features, if encountered, will be conducted under appropriate permits (if any) and documented in applicable reports for

submission to the Los Angeles Fire Department (LAFD), or other regulatory agency, as appropriate.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety; Los Angeles Fire Department; South Coast Air Quality Management District; California Division of Occupational Safety and Health; Department of Toxic Substances Control
- **Monitoring Agency:** Los Angeles Department of Building and Safety; Los Angeles Fire Department
- **Monitoring Phase:** Prior to grading, construction, and/or building permit issuance
- **Monitoring Frequency:** Ongoing during construction and field inspections
- **Action(s) Indicating Compliance:** Issuance of grading, construction, and/or building permit; Field inspection sign-off

HAZ-PDF-2 The proposed Project will include installation of a vapor intrusion mitigation system (VIMS). The VIMS will be installed beneath the proposed building during construction to protect it from any potential for vapor intrusion. Additionally, a passive venting system will be installed as an additional protective measure, above and beyond any necessary measures. The passive venting system will allow potential vapors beneath the structure to be conveyed through piping to various points outside of the building. The passive venting system will have the potential to be turned into an active system, should it ever be deemed necessary during the lifetime of the structure.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

H. Hydrology and Water Quality

(1) Project Design Features

No PDFs are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

I. Noise

(1) Project Design Features

N-PDF-1 Docks. The Project will be limited to no more than 36 dock high truck loading positions.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of a construction and/or building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

N-PDF-2 Construction-source noise. All construction equipment that is required to be equipped with a backup alarm will utilize a broadband-style backup alarm.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to grading, construction, and/or building permit issuance
- **Monitoring Frequency:** Ongoing during construction and field inspections
- **Action(s) Indicating Compliance:** Issuance of grading, construction, and/or building permit; Field inspection sign-off

- N-PDF-3** **Operational-source noise.** Back-up beepers will not be allowed; alternate safety means for exterior operated vehicles will be utilized between the hours of 10:00 p.m. and 7:00 a.m.
- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
 - **Monitoring Agency:** Los Angeles Department of City Planning
 - **Monitoring Phase:** Operation
 - **Monitoring Frequency:** Periodic field inspections
 - **Action(s) Indicating Compliance:** Field inspection sign-off; Compliance report by Applicant
- N-PDF-4** **Operational-source noise.** Loading and unloading will be prohibited within 300 feet of any existing residential building between the hours of 10:00 p.m. and 7:00 a.m. the following day.
- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
 - **Monitoring Agency:** Los Angeles Department of City Planning
 - **Monitoring Phase:** Operation
 - **Monitoring Frequency:** Period field inspections
 - **Action(s) Indicating Compliance:** Field inspection sign-off; Compliance report by Applicant, field inspection logs and reports included in annual reporting to the Planning Department
- N-PDF-5** **Operational-source noise:** The Project will include a minimum 14-foot tall concrete masonry unit (CMU) or concrete wall along the northern property line to shield surrounding uses from noise relating to loading dock activities.
- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
 - **Monitoring Agency:** Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Post-construction
 - **Monitoring Frequency:** Prior to the issuance of construction and/or building permit

- **Action(s) Indicating Compliance:** Issuance of construction and/or building permit; Field inspection sign-off

N-PDF-6 Increased Noise Levels (Demolition, Grading, and Construction Activities).

- Construction and demolition will be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday.
- Demolition and construction activities will be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The contractor will use power construction equipment with muffling devices.
- The contractor will use on-site electrical sources or solar generators to power equipment rather than diesel generators where feasible.
- The contractor will erect a temporary construction noise barrier 24-feet in height along the entire northern property line of the Project Site for the duration of construction activities. The barrier may be constructed with 1-inch plywood but will be solid, without holes or cracks, and will extend to the ground surface.
- During all excavation and grading on-site, construction contractors will equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.
- The contractor will place all stationary construction equipment so that emitted noise is directed away from the nearest noise sensitive receptors to the equipment.
- Equipment will be shut off and not left to idle when not in use.
- The contractor will locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the Project Site during all project construction.
- Jackhammers, pneumatic equipment and all other portable stationary noise sources will be shielded and noise will be directed away from sensitive receptors.
- A construction monitoring program will be prepared in order to document the decrease in noise levels obtained by the above listed construction measures.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to grading, construction, and/or building permit issuance
- **Monitoring Frequency:** Ongoing during construction and field inspections
- **Action(s) Indicating Compliance:** Issuance of grading, construction, and/or building permit; Field inspection sign-off

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

J. Transportation

(1) Project Design Features

T-PDF-1 Loading. All loading and unloading at the Project Site would occur at the rear of the building, along the north side of the Project Site adjacent to the Union Pacific right-of-way and out of sight from public sidewalks. A 14-foot sound wall will be constructed along the northerly property boundary to further screen the on-site loading activities from the existing uses north of the site. Truck access to the loading area will be accommodated by the Vermont Avenue driveway and the northerly driveway on Orchard Avenue only. The Project will be designed such that the loading activities will occur more than 300 feet from the nearest residential unit and out of view from the public right-of-way, which exceeds the requirements for vehicle loading and unloading set forth in LAMC Section 114.03.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction; Operation
- **Monitoring Frequency:** Prior to issuance of building permit; Periodic field inspections
- **Action(s) Indicating Compliance:** Issuance of building permit; Field inspection sign-off; Compliance report by Applicant

T-PDF-2 Construction Staging and Traffic Management Plan. Should any such pedestrian detours or temporary travel lane closures be proposed, traffic control/management plans will be prepared for the required review and approval by Los Angeles Department of Transportation (LADOT). Accordingly, the Construction Site Traffic Management Plan (CSTMP) will include, but not be limited to the following features, as appropriate:

- Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on-and-off-site locations;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses;
- Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency;
- Limit any potential roadway lane closure/s to off-peak travel periods;
- Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation;
- Store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Identify the routes that construction vehicles would utilize for the delivery of construction materials (e.g., lumber, tiles, piping, windows), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project;
- Require the Applicant to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations;
- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods. No hauling or transport will

be allowed during nighttime hours, Sundays, or federal holidays unless required by Caltrans or LADOT;

- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed;
- Haul trucks entering or exiting public streets will at all times yield to public traffic;
- Construction-related parking and staging of vehicles will occur on-site to the extent possible but may occur on nearby public parking lots, as approved by the City;
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times;
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site; and
- The CSTMP will meet standards established in the current California Manual on Uniform Traffic Control Device (MUTCD), as well as City of Los Angeles requirements.
- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Transportation; California Department of Transportation
- **Monitoring Agency:** Los Angeles Department of Transportation
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Prior to issuance of building permit; Ongoing during field inspections
- **Action(s) Indicating Compliance:** Issuance of a building permit; Field inspection sign-off

T-PDF-3

Transportation Demand Management Program. Transportation demand management (TDM) measures are aimed at reducing vehicular traffic generated at project sites and the associated need for parking. TDM measures decrease the number of vehicular trips generated by persons traveling to/from the site by offering specific facilities, services and actions designed to increase the use of alternative transportation modes (e.g., transit, walking, and bicycling) and ridesharing.

In order to comply with the City's TDM, a formal Preliminary TDM Plan will be developed in conjunction with LADOT prior to issuance of a building permit for the Project. This preliminary plan will include, at a minimum, measures consistent with the City's TDM Ordinance. A Final TDM Plan will be prepared prior to issuance of any building permit. The Project TDM plan could include some of the following measures:

- *TDM Information/Promotional Materials.* Provide transportation information in a highly visible and accessible location within the building, including information on local transit providers, area walking routes, bicycling maps, etc., to inform employees and visitors of available alternative transportation modes to access the Project, other amenities in the area and travel opportunities in the area. Highlight the environmental benefits of utilization of alternative transportation modes. In addition, make available transit fare media and day/month passes for purchase by employees and visitors during typical business hours.
- *Transit Welcome Package.* Provide all new employees with a Transit Welcome Package (TWP) in addition to holding a Transportation Fair on an annual basis. At a minimum include information regarding the employer/s' arrangements for free or discounted use of the transit system, area bus/rail transit route and connections/transfers information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the Project.
- *Carpool Program for Employees.* Provide preferential parking within the on-site parking areas for employees who commute to work in registered carpools. An employee who drives to work with at least one other employee to the site may register as a carpool entitled to preferential parking within the meaning of this provision.
- *Public Transit Stop Enhancements.* Work in cooperation with LADOT and other transit agencies to improve the existing bus stop on Vermont Avenue with a shelter and transit information. Enhancements could include enhanced weather/sun protection, lighting, benches, and trash receptacles. These improvements are intended to make riding the bus a safer and more attractive alternative.
- *Convenient Parking/Amenities for Bicycle Riders.* Consistent with LAMC requirements, provide locations at the Project Site for convenient bicycle parking for employees and visitors. Bicycle parking may include bicycle racks, locked cages, or another similar parking area. Provide shower facilities for employees who commute to work via bicycle.

- *Local Hiring Program.* When hiring conduct outreach to residents who live in the study area based on satisfaction of other requirements of the available positions.
- *Flexible/Alternative Work Schedules.* Encourage tenants in the building to offer flexible or alternative work schedules, as well as the opportunity to telecommute if feasible.
- *Parking Cash-Out Program.* Require in any lease it executes as landlord for space within the Project that a parking cash-out program be provided if employees are charged for parking. Parking cash-out program refers to an employer-funded program under which an employer offers in-lieu of any parking subsidy, a transit subsidy or cash allowance (for use of alternative modes such as walking and bicycling) of equal or greater value.
- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Transportation; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of Building and Safety
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Prior to issuance of a building permit
- **Action(s) Indicating Compliance:** Issuance of a building permit

T-PDF-4

Traffic Management Plan and Coordination with Los Angeles Unified School District. Prior to the issuance of a demolition or grading permit, the Project Applicant will prepare a traffic management plan for review and approval by the Los Angeles Unified School District (LAUSD). The traffic management plan will include, but may not be limited to, the following features, as appropriate:

- School buses shall not be restricted in access to schools as a result of Project activities.
- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for LAUSD transported students.
- During and after construction, the Project's traffic patterns, lane adjustment, and altered bus stops will not affect school buses' on-time performance and passenger safety.

- Construction trucks and other vehicles will stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors will install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Haul routes will not pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards will be provided at the Project Applicant's expense when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing will be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors will provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.
- Contractors will maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools, in accordance with LAUSD's School Pedestrian Route Maps.
- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Unified School District
- **Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Unified School District
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Prior to issuance of grading, construction, or building permit
- **Action(s) Indicating Compliance:** Issuance of grading, construction, or building permit; Los Angeles Unified School District approval of Traffic Management Plan

T-PDF-5 Truck Routes. The Project Applicant shall submit plans/exhibits to the City of Los Angeles Department of Transportation depicting the location, dimensions, and text of the direction signs. The plans shall be approved by the Los Angeles Department of Transportation and the approved signs shall be installed prior to the issuance of the first building permit for the Project Site. Established truck routes shall avoid traveling through residential streets or local streets with other sensitive land uses.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Transportation
- **Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Department of Transportation
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Prior to issuance of Building Permit
- **Action(s) Indicating Compliance:** Issuance of Building Permit

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.

K. Tribal Cultural Resources

(1) Project Design Features

No PDFs are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No MMs are identified in the EIR for this environmental issue.