

EXHIBIT D

MITIGATION MONITORING PROGRAM

VTT-82213-1A

July 10, 2025

South Park Towers Project Mitigation Monitoring Program

Case Number: ENV-2018-3337-SCEA

1.1 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 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 State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the proposed South Park Towers Project (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.

A Sustainable Communities Environmental Assessment (SCEA) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts in the SCEA takes into consideration the project design features (PDF) and applies mitigation measures (MM) as necessary to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

1.2 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 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 by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

1.3 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), 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 report to the Enforcement Agency of any non-compliance with the PDFs and MMs within two 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.

1.4 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. 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, RCMs, 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 finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, 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, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. 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.

1.5 MITIGATION MONITORING PROGRAM

A. Hazards and Hazardous Materials

Mitigation Measures

MM-HAZ-1 Soil Management Plan

- A Soils Management Plan (SMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated soils can be properly handled, segregated, stockpiled and disposed of at a licensed disposal facility. Proper handling of the contaminated media would be required regardless of the contamination source.
- The Applicant shall provide confirmation that the VOC concentrations in soil vapor meet the residential scenario Department of Toxic Substances Control-modified Screening Levels (DTSC-SLs) established in DTSC's Human Health Risk Assessment (HHRA).
- In the event that hazardous soils or materials are discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.
- The SMP shall also contain procedures to be followed in the event that any undocumented subsurface features of potential environmental concern are encountered during the excavation grading, and/or other earthmoving activities. These procedures shall include safety training, testing protocols, decontamination and decommission.
- The SMP shall also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses. Impacted soil removed from the Project Site shall comply with the following:
 - A qualified environmental consultant shall be present on the Project Site at the start of soil disturbance activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations of evidence of contamination (primarily VOCs, which includes PCE and TCE).
 - Soil Monitoring during soil disturbance include visual observation (soil staining), representative sampling via a photo ionization detector, and/or VOC monitoring.
 - Timely testing and sampling of soils is required so that VOC-contaminated soils can be separated from inert soils for proper disposal.
 - Impacted soil shall 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.
 - Weekly inspections of all waste shall be performed by a qualified environmental consultant to document that waste is being managed in accordance with the SMP.

- **Enforcement Agency:** South Coast Air Quality Management District, Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Pre-Construction, Construction
- **Monitoring Frequency:** Once during plan check; Ongoing during field inspection
- **Action Indicating Compliance:** Building and Safety permit signoff

B. Noise

Mitigation Measures

Increased Noise Levels (Demolition, Grading, and Construction Activities)

MM-N-1 To the maximum extent possible, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-2 The project contractor shall use power construction equipment with noise shielding and muffling devices.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-3 The project contractor shall erect temporary noise-attenuating sound barriers along the northern and eastern perimeters of the Project Site fronting Venice Street and Hope Street. The sound barrier along the Venice Street frontage shall be designed to provide a minimum sound attenuation of -12.5 dBA. The sound barrier along Hope Street shall be designed to provide a minimum sound attenuation of -10 dBA. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off-site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-4 During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent sensitive receptors does not exceed 5 dBA over the ambient noise levels.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-5 An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-6 The Applicant and contractors shall maintain ongoing contact with administrator of Metro Charter Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. There shall be no staging or parking of construction vehicles, including vehicles to transport workers on Hope Street, north of Venice Boulevard adjacent to the school. Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on Hope Street, north of the Venice Boulevard, adjacent to the school, during school hours.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

PPM-NOISE-2 Groundborne Vibration. The Project would incorporate the following measures from the SCAG PEIR Mitigation Measure PPM-NOISE-2:

(d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.

(e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps).

(f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

C. Public Services

Project Design Features

PDF-PS-1 Public Services (Police – Demolition / Construction Sites). Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

- **Enforcement Agency:** Los Angeles Police Department
- **Monitoring Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once, prior to issuance of building permit
- **Action Indicating Compliance:** Sign-off on LAPD reviewed diagrams; issuance of building permit

PDF-PS-2 Public Services (Police – Operation). The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to: surveillance cameras, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed.

- **Enforcement Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once during plan check; Once prior to issuance of building permit
- **Action Indicating Compliance:** LAPD approval of plans; issuance of building permit

D. Transportation

Mitigation Measures

MM-T-1: Transportation Demand Management (TDM) Promotions and Marketing

The Project shall provide all eligible employees and residents with marketing and promotional materials to educate and inform travelers about site-specific transportation options and effects of their travel choices.

- **Enforcement Agency:** Department of Transportation, Department of City Planning

- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Certificate of Occupancy
- **Monitoring Frequency:** Once during plan check; on-going during operation.
- **Action Indicating Compliance:** Certificate of Occupancy.

MM-T-2 Shared Mobility

The project shall provide on-demand access to shared mobility options as an incentive to consider other transportation travel modes. The Project shall provide five car-share spaces, ten bike-share spaces, and a rideshare program.

- **Enforcement Agency:** Department of Transportation, Department of City Planning
- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Site Plan Review
- **Monitoring Frequency:** Once during plan check; on-going during operation.
- **Action Indicating Compliance:** Issuance of building permit; Certificate of Occupancy.

MM-T-3 Unbundle Parking

The Project shall provide unbundled parking which separates the leasing of parking from leasing of apartments so that residents must specifically opt in to paying to park a car. The analysis estimated that a parking space would cost at least \$220 per month for residents to lease. The Applicant shall unbundle parking costs from residential lease payments and charge at least \$220 per month per parking space for residents who park on site.

- **Enforcement Agency:** Department of Transportation, Department of City Planning
- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Certificate of Occupancy
- **Monitoring Frequency:** On-going during operation.
- **Action Indicating Compliance:** Issuance of building permit; Certificate of Occupancy.

E. Utilities and Service Systems

Project Design Features

PDF-PU-1 As part of its application for a water supply assessment from the LADWP, the Applicant would include the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project:

- Fixtures
 - ENERGY STAR Certified Residential Dishwashers – standard with 3.0 gallons per cycle in lieu of 3.5 gallons per cycle
 - High Efficiency Toilets with flush volume of 1.1 gallons of water per flush (gpf) in lieu of 1.28 gpf
 - Showerheads with flow rate of 1.5 gallons per minute (gpm) in lieu of 1.8 gpm
- Landscape and Irrigation
 - Drip/Subsurface Irrigation (Micro-Irrigation)

- Proper Hydro-zoning/zoned Irrigation (groups plants with similar water requirements together)
- Pool
 - Domestic Pool/Spa recirculating filtration equipment
 - Water-Saving Pool Filter
- **Enforcement Agency:** Department of City Planning; Los Angeles Department of Water and Power
- **Monitoring Agency:** Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once prior to issuance of building permit
- **Action Indicating Compliance:** Issuance of building permit; Field inspection sign-off