

EXHIBIT C
MITIGATION MONITORING PROGRAM

VTT-82974-CN-HCA-1A
OCTOBER 9, 2025

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, Section 15097(a) of the California Code of Regulations Title 14 (CEQA Guidelines) 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, PRC Section 21081.6 and Section 15097 of the CEQA Guidelines.

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 in the EIR takes into consideration the project design features (PDF) and applies mitigation measures (MM) 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 PDF and MM 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; and

- 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.

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 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 any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within the specified time following 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.

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 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.

5. Mitigation Monitoring Program

a) Air Quality

(1) Project Design Features

Project Design Feature AQ-PDF-1: Construction Power Pole Usage. The Project contractor(s) will use electricity from power poles (where available) and/or solar-powered generators rather than temporary diesel or gasoline generators during 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 prior to issuance of demolition or grading permit; periodically during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable demolition or grading permit; field inspection sign-offs

(2) Mitigation Measures

Mitigation Measure AQ-MM-1: Construction Equipment Features: The Applicant shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 25 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- Contractors shall 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 shall 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 shall be prohibited.

- Contractors shall ensure that all air compressors, cement and mortar mixers, concrete/industrial saws, plate compactors, rollers, signal boards, skid-steer loaders, sweepers/scrubbers and welders used during construction activities are electric powered. Additionally, contractors shall ensure one piece of the following types of equipment from each construction activity that uses them would be electric powered: tractor/loader/backhoes, forklifts, graders, pumps and rough terrain forklifts. In addition, where commercially available for the Project Site, construction equipment shall meet Tier 5 requirements when standards are adopted by CARB. For purposes of this mitigation measure, "commercially available" is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Los Angeles and available in a similar timeframe to fossil-fueled options. If Tier 5 engine equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 5 engine equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment.
- **Enforcement Agency:** 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 prior to issuance of demolition or grading permit; periodically during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable demolition or grading permit; field inspection sign-offs

Mitigation Measure AQ-MM-2: Concrete Truck Features: The Applicant shall implement the following measures to reduce the emissions of air pollutants generated by concrete trucks:

- The contractor shall use concrete trucks with an average capacity of 10 cubic yards to minimize the number of concrete truck trips;

- The contractor shall use local concrete suppliers with concrete supplied by one or more facilities located within a driving distance of approximately 10 miles per one-way trip (approximately 20 miles per round trip).
 - The contractor shall be required to ensure that trucks used to deliver concrete are made by CNG-fueled concrete trucks or trucks that achieve the same or lower NO_x emissions as CNG-fueled concrete trucks.
 - 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 days of concrete pouring. 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
 - **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 demolition or grading permit; periodically during field inspection
 - **Action Indicating Compliance:** Plan check approval and issuance of building permit; field inspection sign-offs

Mitigation Measure AQ-MM-3: Emergency Generator Maintenance & Testing: The Project representative shall schedule routine maintenance and testing of the emergency generators installed on the Project Site on different days. Prior to the installation of emergency generators, the Project representative shall supply documentation to the City that emergency generator testing by contractors, service providers, or maintenance crews will be conducted in accordance with the specified requirements. The Project representative shall maintain records of emergency generator testing, including testing dates, which shall be made available to the City upon request.

- **Enforcement Agency:** 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; periodically during operation and during routine maintenance and testing
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; field inspection sign-offs

Mitigation Measure AQ-MM-4: Electric Landscaping Equipment: The Project representative shall only allow for electric landscaping equipment to be used at the Project Site. If electric landscaping equipment for specific types of equipment are not commercially available from landscaping contractors then up to two pieces of landscaping equipment per day may be gasoline-fueled. The Project representative shall require that landscaping contract documents include the requirement to use electric landscaping equipment for all future operational landscaping activities.

- **Enforcement Agency:** 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; periodically during operation
- **Action Indicating Compliance:** Plan check approval and submittal of compliance report by Applicant; field inspection sign-offs

Mitigation Measure AQ-MM-5: Use of Super-Compliant VOC Paints. The Project representative shall only allow “Super-Compliant” architectural coating paints to be used at the Project Site as defined by SCAQMD to be less than 10 grams per liter VOC for all future operational on-going maintenance coating and painting activities (does not apply to coating activities for future new construction, tenant improvements, and additions). The Project representative shall require that all tenant and lease contract documents include the requirement to use “Super-Compliant” architectural coating paints for all future operational coating and painting activities.

- **Enforcement Agency:** 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; periodically during operation
- **Action Indicating Compliance:** Plan check approval and submittal of compliance report by Applicant; field inspection sign-offs

b) Cultural Resources

(1) Project Design Features

No Project Design Features were identified in regard to cultural resources.

(2) Mitigation Measures

Mitigation Measure CUL-MM-1: Documentation. In order to document the LACS Building and its contribution to the early industrial history of Los Angeles, prior to the issuance of demolition permits, or any abatement or demolition work on the North Site, the LACS Building shall be documented according to Historic American Building Survey (HABS) Level III standards, appropriate for a building that has not been formally designated but which has been identified as significant in a historic resources survey. The Project would result in a cumulative impact to the cold storage property type; therefore, the documentation shall provide information to future researchers on an increasingly rare property type that played a crucial role in the industrial development of the City in the early 20th century. The HABS Level III documentation shall be prepared by a historian or architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Standards in the relevant discipline. The documentation shall be reviewed and approved by the Department of City Planning, Office of Historic Resources. Digital copies of the documentation shall be offered to the following repositories: the Los Angeles Public Library; Department of City Planning's Office of Historic Resources; and the Los Angeles Conservancy.

- **Enforcement Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once, prior to the issuance of any demolition permits for the North Site
- **Action Indicating Compliance:** Submittal of a compliance report to the City of Los Angeles Department of City Planning's Office of Historic Resources

Mitigation Measure CUL-MM-2: Interpretation. The Applicant shall develop an interpretive program describing the history of the LACS Building and Los Angeles Cold Storage. The interpretive program shall be made accessible to the public and may include historic photographs or other ephemeral materials documenting the history of the Los Angeles Cold Storage, the development of the Industrial core of Los Angeles, the history of the Project Site as an early ice production and cold storage facility, and other relevant themes as determined. The format and location of the interpretive program shall be reviewed and approved by the Department of City Planning's Office of Historic Resources.

- **Enforcement Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources
- **Monitoring Phase:** Post-construction

- **Monitoring Frequency:** Prior to issuance of Certificate of Occupancy; post-construction field inspection
- **Action Indicating Compliance:** Submittal of an interpretive program to the City of Los Angeles Department of City Planning's Office of Historic Resources

Mitigation Measure CUL-MM-3: Thawing Plan. Once the LACS Building is no longer in operation as a cold storage facility, a thawing process shall be undertaken prior to conducting any testing to determine the condition of the structural elements and other historic features. In order to minimize potential damage to the LACS Building resulting from thawing a building that has been used for cold storage for over 100 years, the Applicant shall retain a qualified structural engineer who meets the Secretary of the Interior's Historic Preservation Professional Standards in Engineering to prepare a "Thawing Plan." The Thawing Plan shall be prepared prior to the issuance of any demolition permits for the North Site, and shall be reviewed and approved by the Department of City Planning's Office of Historic Resources.

- **Enforcement Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once, prior to the issuance of any demolition permits for the North Site
- **Action Indicating Compliance:** Submittal of Thawing Plan to the City of Los Angeles Department of City Planning's Office of Historic Resources

Mitigation Measure CUL-MM-4: Structural Analysis. Once the thawing process of the LACS Building is complete, and prior to the issuance of any demolition permits for the North Site, the Applicant shall retain a qualified structural engineer to conduct the appropriate "Structural Analysis" to determine whether the West Volume of the LACS Building can be retained, rehabilitated, and adaptively reused as part of the Project. The structural engineer shall meet the Secretary of the Interior's Historic Preservation Professional Standards in Engineering and shall have specific expertise in the evaluation of historical resources. The methodology for the Structural Analysis shall be reviewed and approved by the Department of City Planning, Office of Historic Resources, and is to include the following tests:

- Compressive Strength of Concrete Test. The compressive strength of the structural concrete must be a minimum of 2,000 pounds per square inch (psi). A lower number might indicate damaged concrete due to freeze and thaw and increases the unreliability of the quality of concrete to support future loads for the new lifespan of the Project.
- Yield/Tensile Strength of Reinforcing Steel Test. The yield/tensile strength of the rebar must be a minimum 20,000 psi. A lower number might indicate excessive

rusting of the reinforcing steel and increases the unreliability of the reinforcing steel to support future loads for the new lifespan of the Project.

- **Foundation/Soil Sampling.** The soil bearing capacity must be a minimum of 1,500 pounds per square foot (psf). A lower number might indicate erosion of the soil due to freeze and thaw and would be unsuitable to support future loads for the new lifespan of the Project due to excessive settlement.

The results of the Structural Analysis shall be submitted for review and approval by the Department of City Planning's Office of Historic Resources and the Los Angeles Department of Building and Safety. A qualified structural engineer shall make a determination on the potential for the West Volume of the LACS Building to be retained and rehabilitated based on the results of the Structural Analysis testing. If, as determined by a qualified structural engineer, the Structural Analysis demonstrates that the strength of concrete, strength of reinforcing steel, or the foundation/soil sampling tests do not meet the required thresholds as outlined above and therefore the West Volume of the LACS Building would be unreliable to support future loads for the lifespan of the Project; or, if it is determined that the West Volume of the LACS Building meets the definition of a "Hazardous Building" as specified in LAMC Division 89, Section 91.8902, the Applicant may apply for and receive a demolition permit for the West Volume of the LACS Building.

If the Structural Analysis, as approved by the Department of City Planning, Office of Historic Resources and the Los Angeles Department of Building and Safety, demonstrates that the West Volume of the LACS Building is structurally sound for human occupancy, it shall be retained, rehabilitated, and adaptively reused as part of the Project.

- **Enforcement Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once, prior to the issuance of any demolition permits for the North Site
- **Action Indicating Compliance:** Submittal of Structural Analysis to the City of Los Angeles Department of City Planning's Office of Historic Resources and the City of Los Angeles Department of Building and Safety, and issuance of applicable building permit

The following recommended mitigation measures would apply only if the West Volume of the LACS Building is to be retained:

Mitigation Measure CUL-MM-5: Historic Architect. If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, the Applicant shall retain a historic architect who meets the Secretary of the Interior's Historic Preservation Professional Standards in Historic Architecture. The historic architect shall prepare the

Historic Structure Report and Mothballing Plan as specified; shall review the proposed plans for the rehabilitation and adaptive reuse of the West Volume of the LACS Building to ensure the appropriate treatment of the significant character-defining features of the West Volume of the LACS Building; and shall be responsible for overseeing the implementation of the proposed plans for the rehabilitation and adaptive reuse related to historical resources on behalf of the Applicant.

- **Enforcement Agency:** City of Los Angeles Department of City Planning’s Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning’s Office of Historic Resources
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Prior to the issuance of demolition permits for the North Site and periodically during construction
- **Action Indicating Compliance:** Submittal of compliance documentation to the City of Los Angeles Department of City Planning’s Office of Historic Resources

Mitigation Measure CUL-MM-6: Historic Structure Report. If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, in order to provide adequate documentation to guide the rehabilitation of the West Volume of the LACS Building, a Historic Structure Report (“HSR”) shall be prepared for the West Volume of the LACS Building. The HSR shall be prepared in conformance with the National Park Service’s *Preservation Brief 43: The Preparation and Use of Historic Structures Reports*.¹ The HSR shall provide complete documentary, graphic, and physical information about both the history and existing condition of the West Volume of the LACS Building. In addition, the report shall include appropriate methods for treatment of the West Volume, which would be retained and rehabilitated as part of the Project, outline a recommended scope of work, and provide information and recommendations for further treatment. The HSR shall be prepared by a qualified historic architect who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture. The HSR shall be reviewed and approved by the Department of City Planning’s Office of Historic Resources.

- **Enforcement Agency:** City of Los Angeles Department of City Planning’s Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning’s Office of Historic Resources
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once, prior to the issuance of any demolition permits for the North Site

¹ U.S. Department of the Interior, National Park Service. “Preservation Brief 43: The Preparation and Use of Historic Structures Reports,” 2005.

- **Action Indicating Compliance:** Submittal of HSR to the City of Los Angeles Department of City Planning's Office of Historic Resources

Mitigation Measure CUL-MM-7: Mothballing Plan. If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, because the Project is proposed to be undertaken in phases, in order to protect the West Volume of the LACS Building until it is rehabilitated as part of the Project, a Mothballing Plan shall be prepared and implemented for the West Volume of the LACS Building. The Mothballing Plan shall be prepared in conformance with the National Park Service's *Preservation Brief 31: Mothballing Historic Buildings*.² The Mothballing Plan shall outline the steps required to temporarily protect the West Volume of the LACS Building from damage or deterioration and shall be updated after five years. The Mothballing Plan shall be prepared by a qualified historic architect who meets the Secretary of the Interior's Historic Preservation Professional Standards in Historic Architecture. The Mothballing Plan shall be reviewed and approved by the Department of City Planning's Office of Historic Resources.

- **Enforcement Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; post-construction
- **Monitoring Frequency:** Prior to the issuance of any demolition permits for the North Site; after 5 years following preparation of initial Plan
- **Action Indicating Compliance:** Submittal of Mothballing Plan to the City of Los Angeles Department of City Planning's Office of Historic Resources and the City of Los Angeles Department of Building and Safety

Mitigation Measure CUL-MM-8: Protection Plan. If the West Volume is retained and rehabilitated as part of the Project per Mitigation Measure CUL-MM-4, prior to issuance of a grading permit, a structural engineer who meets the Secretary of the Interior's Historic Preservation Professional Standards in Engineering shall prepare a "Protection Plan" to ensure that the West Volume of the LACS Building is properly protected from potential damage resulting from demolition, excavation, and construction procedures on the Project Site, including an appropriate shoring plan to mitigate the possibility of settlement due to the removal of adjacent soil. The Protection Plan shall be reviewed by a historic architect who meets the Secretary of the Interior's Historic Preservation Professional

² U.S. Department of the Interior, National Park Service, "Preservation Brief 31: Mothballing Historic Buildings," 1993.

Standards in Historic Architecture, and approved by the Department of City Planning's Office of Historic Resources.

- **Enforcement Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Prior to the issuance of any grading permits for the North Site; periodic field inspections during construction
- **Action Indicating Compliance:** Submittal of Protection Plan to the City of Los Angeles Department of City Planning's Office of Historic Resources and the City of Los Angeles Department of Building and Safety; field inspection sign-offs

Mitigation Measure CUL-MM-9: 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 for professional archaeology (qualified Archaeologist) to carry out and ensure proper implementation of mitigation measures that address archaeological resources. The Applicant shall submit a letter of retention to the City of Los Angeles Department of City Planning (City) before construction activities commence to demonstrate to the City that the Applicant has retained a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards. The letter shall include a resume for the qualified Archaeologist.

The qualified Archaeologist shall oversee an archaeological monitor who has a bachelor's degree in a relevant field of study and either two months of archaeological construction monitoring experience or two months of supervised training with prehistoric or historic archaeological materials in a field or laboratory setting. The archaeological monitor shall be present during construction activities on the Project Site deemed by the qualified Archeologist to have the potential for encountering archeological resources, such as demolition, pavement removal, clearing/grubbing, drilling/auguring, potholing, grading, trenching, excavation, tree removal, or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project Site, such as utilities, sidewalks, or road improvements. The archeological monitor shall have the authority to reasonably direct the pace of construction equipment activity in areas reasonably expected to be of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of archaeological resources in coordination with the qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the qualified Archaeologist.

- **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

- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Prior to issuance of a demolition permit; ongoing during demolition, excavation, and grading activities
- **Action Indicating Compliance:** Issuance of a demolition permit; submittal of compliance report by qualified Archaeologist

Mitigation Measure CUL-MM-10: Prior to commencement of construction activities, a Sensitivity Training shall be given by the qualified Archaeologist for construction personnel. The training shall focus on how to identify archaeological resources that may be encountered during construction activities, and the procedures to be followed in such an event. Within five days of completing the training, a list of those in attendance shall be provided by the qualified Archaeologist to the Applicant. The Applicant shall maintain the documentation of this training, including the list of attendees, for inspection by the City upon its reasonable request.

- **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 a demolition or grading permit; submittal of compliance report by qualified Archaeologist

Mitigation Measure CUL-MM-11: In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, 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. An appropriate buffer area shall be established by the archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue until the evaluation is completed. Work shall be allowed to continue outside of the buffer area.

All 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 resource. The treatment plan established for the resource shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for

unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

- **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:** Ongoing during Project demolition, grading, and construction
- **Action Indicating Compliance:** Submittal of compliance report by qualified Archaeologist

Mitigation Measure CUL-MM-12: Within 14 days of concluding the archaeological monitoring, the qualified Archaeologist shall prepare a memorandum stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memorandum shall be submitted to the Applicant and City. Following submittal of the memorandum, the qualified Archaeologist shall prepare a technical report that follows the format and content guidelines provided in California Office of Historic Preservation’s Archaeological Resource Management Reports (ARMR). The technical 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 and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be submitted to the City within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, within 14 days of concluding the archaeological monitoring
- **Action Indicating Compliance:** Submittal of memorandum by qualified Archaeologist

c) Geology and Soils

(1) Project Design Features

No Project Design Features were identified in regard to geology and soils.

(2) Mitigation Measures

Mitigation Measure PALEO-MM-1: Prior to the issuance of demolition permits, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards. 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 to go over the monitoring requirements, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.

- **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 permit; periodic during construction activities
- **Action Indicating Compliance:** Issuance of demolition permit; submittal of compliance report by Qualified Paleontologist

Mitigation Measure PALEO-MM-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments that exceed 10 feet in depth. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location. Any fossils encountered and recovered shall

be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, 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:** Ongoing during demolition, excavation, and grading activities
- **Action Indicating Compliance:** Submittal of compliance report by Qualified Paleontologist

Mitigation Measure PALEO-MM-3: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City and the Natural History Museum of Los Angeles County to signify the satisfactory completion of the Project and required mitigation measures.

- **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:** Ongoing during demolition, excavation, and grading activities
- **Action Indicating Compliance:** Submittal of compliance report by Qualified Paleontologist

d) Greenhouse Gas Emissions

(1) Project Design Features

Project Design Feature GHG-PDF-1: Green Building Features. The Project will include the following green building features:

- The Project's buildings will be designed to achieve the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification or equivalent and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.
- The Project will promote alternatives to conventionally fueled automobiles by designating a minimum of eight percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and shall pre-wire, or install conduit and panel capacity for a minimum of 30 percent of the LAMC-required electric vehicle parking spaces, with 10 percent of the LAMC-required spaces further improved with electric vehicle charging stations.
- **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 Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check prior to issuance of building permit; once after completion of LEED Gold Certification or equivalent commissioning activities
- **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; post-construction documentation, which indicates that the Project operates within the expected parameters to achieve the number of points required for LEED Gold Certification or equivalent; issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures were identified in regard to greenhouse gas emissions.

e) Noise and Vibration

(1) Project Design Features

Project Design Feature NOI-PDF-1: Impact Pile Drivers Prohibited): The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating augured, drilled, or vibratory piles are permitted.

- **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 during plan check; periodic field inspections
- **Action Indicating Compliance:** Issuance of building permit; field inspection sign-offs

Project Design Feature NOI-PDF-2 (Construction Equipment Maintenance): During plan check for each phase of the Project, the contractor will provide a statement to the City indicating their powered construction equipment (including combustion engines), fixed or mobile, will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

- **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 for each phase of the Project; periodic field inspections
- **Action Indicating Compliance:** Plan check approval and issuance of any demolition, grading or building permit; field inspection sign-offs

Project Design Feature NOI-PDF-3: Mechanical Equipment Noise. All outdoor mounted building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Los Angeles through the use of quiet fans, duct silencers, parapets, enclosures, mufflers, or similar noise attenuation methods.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **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 building permit; once at field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; field inspection sign-offs

Project Design Feature NOI-PDF-4 (Loading Dock Screening): All loading docks will be acoustically screened from off-site noise-sensitive receptors. Acoustical screening of loading docks will be achieved through the use of physical barriers (i.e., walls, buildings or other structures that fully block the line-of-sight between the loading dock and off-site noise-sensitive receptors), or with loading dock seals installed between the truck and loading dock. Acoustical screening may also be achieved by requiring loading activities to be conducted fully inside buildings, or by similar methods.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **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 building permit; once at field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; field inspection sign-offs

(2) Mitigation Measures

Mitigation Measure NOISE-MM-1: Temporary Noise Barriers. Temporary noise barriers shall be used along the western, northern, southern, and eastern property boundaries to block the line-of-sight between the construction equipment and the noise-sensitive uses.

- Temporary noise barriers shall be placed along the Project's North site eastern property line. The noise barrier shall be a minimum of eight feet in height and provide a minimum 3-dBA noise reduction at the ground-level for the residences to the east (receptor location R2).
- Temporary noise barriers shall be placed along the Project's Upper South site and West site northern property lines. The noise barriers shall be a minimum of 12 feet in height and provide a minimum 12-dBA noise reduction at the ground-level for the hotel uses to the north/northwest of the Upper South site and West site (receptor locations R5 and R6) and to the residential uses to the east of the Upper South site (receptor location R2).
- Temporary noise barriers shall be placed along the Project's Upper South site and Lower South site eastern property line. The noise barriers shall be a minimum of 12 feet in height and provide a minimum 12-dBA noise reduction at the ground-level for the residences to the east of the Upper South site and Lower South site (receptor location R2).
- Temporary noise barriers shall be placed along the Project's North site, Upper South site, Lower South site, and West site western property lines. The noise barriers shall be a minimum of 12 feet in height and provide a minimum 13-dBA noise reduction at the ground-level for the residences and hotel uses to the west (receptor locations R3 through R6).
- Temporary noise barriers shall be placed along the Project's West site and Lower South site southern property line. The noise barrier shall be a minimum of 12 feet in height and provide a minimum 13-dBA noise reduction at the ground-level for the residential and hotel uses to the south of the West site and Lower South site (receptor locations R3 and R4).

These noise barriers shall be in-place during early Project construction phases (remain up to the start of building framing) and during paving when heavy equipment is used.

Temporary barriers shall provide acoustically sealed gate access as needed for construction activities, deliveries, and site access by construction personnel.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** 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 check approval and issuance of any demolition, grading, or building permit; submittal of compliance report from qualified noise consultant

Mitigation Measure NOISE-MM-2: Compressors and Generators. Construction equipment whose specific location on the Project Site may be flexible (e.g., compressors and generators) shall be located at least 100 feet away from the nearest off-site sensitive land uses, or barriers (e.g., intervening construction trailers, walls, enclosures, etc.) shall be used to screen propagation of noise from such equipment towards these land uses.

- **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 check approval and issuance of any demolition, grading, or building permit; field inspection sign-offs

NOI-MM-3: Construction Equipment Muffling and Shielding Devices. The Project contractor shall use power construction equipment with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. Flexible sound control curtains shall be placed around all stationary compressors and generators, drilling apparatuses, drill rigs, and jackhammers when in use. The flexible sound control curtains shall have a minimum Sound Transmission Class (STC) rating of 25.

- **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 check approval and issuance of any demolition, grading, or building permit; field inspection sign-offs

Mitigation Measure NOISE-MM-4: Foundation Concrete Trucks. Contractors shall include in all concrete truck contracts used during the foundation pouring phase of construction a requirement for trucks traveling to and from the Project Site to prohibit

travel on Central Avenue between 1st Street and 2nd Street, Central Avenue between 2nd Street and 3rd Street, and 4th Street between Alameda Street and Hewitt Street during the Project's foundation concrete pouring duration. The construction contractor shall provide a flag person along the segments identified above to ensure that all concrete trucks do not travel along the identified segments.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **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 check approval and issuance of any demolition, grading, or building permit; field inspection sign-offs

Mitigation Measure NOISE-MM-4: Amplified Speakers – Special Events. Outdoor amplified sound systems, if any, will be limited to a sound level equivalent to 90 dBA (L_{eq-1hr}) measured at a distance of 25 feet from the amplified speaker sound system during special events occurring at the Central Courtyard or Pop-Up Plaza. A qualified noise consultant shall provide written documentation that the design of the system complies with the maximum noise level. Compliance will be ensured through pre-performance noise tests/measurements for performances or ambient music speakers with potential to exceed the sound level, along with any necessary adjustments to the location and nature of proposed performances or ambient music speakers. Speakers will be downward or inward facing and shielded from off-site sensitive uses. The Applicant or Operator shall prepare standard operating procedures for the use of amplified speakers at this location consistent with this requirement. The standard operating procedures shall be provided to the City and the Los Angeles Police Department (LAPD) prior to the issuance of a special event permit for the Project and posted on-site in the event of LAPD response to noise complaints.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning; Los Angeles Police Department
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Once at Project plan check; once during first occurrence each special event type
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; submittal of compliance report from qualified noise consultant after first occurrence of each special event type

Mitigation Measure NOISE-MM-6: Construction Vibration (Except Shoring). The operation of construction equipment that generates high levels of vibration, such as large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be prohibited within

15 feet, 14 feet, eight feet, and two feet, respectively, of receptor V3 (commercial buildings to the south, west, and southwest of Project's West site). The contractor(s) shall require and document compliance with the minimum allowable setbacks in a construction vibration management plan, which shall be provided to the City prior to issuance of a demolition permit. The construction vibration management plan shall detail the specific types of equipment to be used during demolition, grading, and building construction, estimated vibration velocities, and distance to vibration receptor V3. Equipment and or alternative construction techniques to be used within the required setbacks for large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be identified to ensure that vibration velocities will not exceed thresholds for potential structural damage. This measure does not apply to temporary shoring activities and shoring infrastructure that must be installed to provide adequate physical support for subterranean excavation.

- **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 check approval and issuance of any demolition, grading, or building permit; field inspection sign-offs

Mitigation Measure NOISE-MM-7: Inspections. Prior to the issuance of a demolition or building permit, the Applicant shall retain the services of a third-party licensed building inspector or structural engineer to inspect and document (video and/or photographic) vibration receptor V3 (Commercial buildings to the south, west, and southwest of Project's West site) for the physical condition of the building's readily-visible features. Daily inspections shall occur when construction activities involving vibration-generating equipment such as bulldozers, jackhammers, loaded trucks, and drill rigs are used at 15 feet, 14 feet, eight feet, and two feet, respectively of V3. In the event that unanticipated or unexpected damage occurs due to construction vibration at receptor location V3's older structure based on assessment by the third-party inspector or engineer, the Applicant/or the Applicants designated representative, shall arrange for repairs during the construction phase. Such repairs, if needed shall be undertaken by a contractor licensed by the State of California to conduct commercial building repairs.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning's Office of Historic Resources; City of Los Angeles Bureau of Engineering
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning's Office of Historic Resources
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Prior to the issuance of a demolition or building permit; periodic field inspections

- **Action Indicating Compliance:** Plan check approval and issuance of applicable demolition or building permit; field inspection sign-offs

f) Fire Protection

(1) Project Design Features

No Project Design Features were identified in regard to fire protection.

(2) Mitigation Measures

Mitigation Measure PS-MM-1: Prior to building occupancy, the Project shall implement the following improvements as shown in Exhibit 2 of the Infrastructure Report prepared for the Project by KPFF Consulting Engineers, dated May 2023: 1) upgrade approximately 110 linear feet of the existing six-inch line in 4th Street to an eight-inch line; 2) Relocate the hydrant (FH 16418) to the north due to the proposed 4th Street dedication and reconnect it to the upsized eight-inch line; and 3) Reconnect the hydrant (FH 9377) on the south to the upsized eight-inch line.

- **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 building permit; once at field inspection prior to Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; field inspection sign-offs prior to Certificate of Occupancy

g) Police Protection

(1) Project Design Features

Project Design Feature POL-PDF-1: Security Features During Construction. Private security personnel will monitor vehicle and pedestrian access to the construction areas and patrol the Project Site, construction fencing with gated and locked entry will be installed around the perimeter of the construction site, and security lighting will be provided in and around the construction 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

Project Design Feature POL-PDF-2: Security Features During Operation. The Project will incorporate a security program to ensure the safety of its residents, employees, and visitors. Design strategies within the Project design would include, but not be limited to, the following:

- Hallways and corridors would be straight forward with no dark corners, as possible;
- Outdoor areas would be exposed to windows and allow for natural surveillance;
- Clear transitional zones would be provided between public, semi-public and private spaces;
- Access key cards and cameras would be used, as necessary; and
- Interior and exterior spaces would be well lit with proper signage to direct the flow of people and decrease opportunities for crime.

In addition, the following security measures would be implemented by the Project:

- Installing and utilizing a security camera network throughout the Project Site.
 - Controlled access to all building elevators, residences, and resident-only common areas through electronic access control equipment specific to each user, as possible.
 - Training employees on appropriate security policies for the Project's buildings. Duties of the staff would include, but would not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and monitoring the Project Site.
 - Providing a security program for the ground level open space areas.
 - Access to commercial uses would be unrestricted during business hours, with public access discontinued after businesses, such as retail and restaurant uses, have closed.
- **Enforcement Agency:** Los Angeles Police Department, 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; Once during field inspection
 - **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

(2) Project Design Features

No mitigation measures were identified in regard to police protection.

h) Transportation

(1) Project Design Features

Project Design Feature TRAF-PDF-1: Construction Management Plan. Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan, including haul routes and a staging plan, will be prepared and submitted to the City for review and approval. The Construction Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
 - Prohibition of construction worker or equipment parking on adjacent streets;
 - Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
 - Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
 - Containment of construction activity within the Project Site boundaries;
 - Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
 - Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
 - Spacing of trucks so as to discourage a convoy effect;
 - Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
 - Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
 - Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.
- **Enforcement Agency:** Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
 - **Monitoring Agency:** Los Angeles Department of Transportation
 - **Monitoring Phase:** Pre-construction; construction

- **Monitoring Frequency:** Once at plan check prior to issuance of applicable demolition or building permit; periodic field inspections
- **Action Indicating Compliance:** Approval of Construction Management Plan from the Los Angeles Department of Transportation prior to issuance of applicable demolition or building permit; field inspection sign-offs

(2) Mitigation Measures

No mitigation measures were identified in regard to transportation.

i) Tribal Cultural Resources

(1) Project Design Features

No Project Design Features were identified in regard to tribal cultural resources.

(2) Mitigation Measures

Mitigation Measure TCR-MM-1: Prior to the issuance of a demolition permit, the Applicant shall retain a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe) who shall be present during construction activities deemed by the Native American Monitor to have the potential for encountering tribal cultural resources, such as demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project Site, such as utilities, sidewalks, or road improvements. A monitoring agreement between the Applicant and Kizh Nation shall be prepared that outlines the roles and responsibilities of the Native American Monitor and shall be submitted to the City prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. A qualified Archaeologist, along with a Native American Monitor (if available), shall also provide Sensitivity Training to construction personnel as required by Mitigation Measure CUL-MM-10.

The Native American Monitor, in coordination with the qualified Archaeologist and archaeological monitor as identified in Mitigation Measure CUL-MM-9, shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of tribal cultural resources. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the Applicant or Lead Agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project Site or in connection with the Project are complete; or (2) a determination and written notification

by the Kizh Nation to the Project Applicant/Lead Agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact tribal cultural resources.

- **Enforcement Agency:** City of Los Angeles Department of Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Prior to issuance of demolition permit; ongoing during demolition and excavation activities
- **Action Indicating Compliance:** Letter of Retention submitted to Los Angeles Department of City Planning (Pre-Construction) and issuance of demolition permit; field inspection sign-off from Native American Monitor (Construction); completed report by certified archaeologist and Native American Monitor

Mitigation Measure TCR-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Gabrieleño Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Project Applicant/Lead Agency upon written request to the Gabrieleño Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.

- **Enforcement Agency:** City of Los Angeles Department of Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction demolition and excavation activities
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Completed daily monitoring logs by Native American Monitor

Mitigation Measure TCR-MM-3: In the event that prehistoric/Native American (e.g., hearths, 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. An appropriate buffer area shall be established by the Native American Monitor and archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional

discoveries in the vicinity, and safety considerations for those making and evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the qualified Archaeologist, the Gabrieleño Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City of Los Angeles determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, a treatment plan shall be developed by the Gabrieleño Tribe, with input from the qualified Archaeologist as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be implemented prior to construction work continuing in the buffer around the find. The preferred treatment is avoidance, but if not feasible may include, but would not be limited to, capping in place, excavation and removal of the resource and follow-up laboratory processing and analysis, interpretive displays, sensitive area signage, or other mutually agreed upon measures. The treatment plan shall also include measures regarding the curation of the recovered resources. The recovered prehistoric or Native American resources may be placed in the custody of the Gabrieleño Tribe who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Gabrieleño Tribe nor institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

- **Enforcement Agency:** City of Los Angeles Department of Planning
- **Monitoring Agency:** City of Los Angeles Department of Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction demolition and excavation activities
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** If archaeological resources are unearthed, submittal of a completed treatment plan by the Gabrieleno Tribe, with input from the qualified Archaeologist as necessary, and with the concurrence of the City's Planning Director

j) Utilities and Service Systems - Water Supply

(1) Project Design Features

Project Design Feature WS-PDF-1: Water Conservation Features. The Project will provide the following specific water efficiency features:

- Fixtures for the entire Project
 - ENERGY STAR Certified Commercial Clothes Washers – utilizing less than a Water Factor of “4” and a max capacity of “6” cubic feet

- ENERGY STAR Certified Residential Clothes Washers – Front-loading or Top-loading with Integrated Water Factor and capacity as follows:
 - Front-loading with capacity greater than “2.5” cubic feet: Integrated Water Factor of less than “3.2”
 - Top-loading with capacity greater than “2.5” cubic feet: Integrated Water Factor of less than “4.3” or less
 - Either front- or top-loading with capacity of less than or equal to “2.5” cubic feet: Integrated Water Factor of “4.0” or less
- ENERGY STAR Certified Residential Dishwashers – standard with 3.2 gallons/cycle or less or compact with less than “3.1” gallons/cycle
- Hybrid Waterless Urinals with a flush volume of one gallon per 72 hours, (WaterSense labels are not available for hybrid or waterless urinals)
- WaterSense-labeled High Efficiency Toilets with a flush volume of “1.1” gallons per flush, or less
- WaterSense-labeled Showerheads with a flow rate of 1.5 gallons per minute, or less in all residential units
- Landscape and irrigation
 - California Friendly® plants or native plants
 - Drip/Subsurface Irrigation (Micro-Irrigation)
 - Irrigation Controls programmed to real-time weather conditions
 - Leak Detection System for irrigation
 - Micro-Spray
 - Design and use where feasible water-efficient flowing/recirculating water features such as fountains in ways to reduce evaporation and makeup water
 - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
 - Rainwater Harvesting and Grey Water Use/Storage where and when feasible and if space is available for the system (e.g., tanks, pumps, and filtration systems). Greywater sources may include bathroom faucets, showers, clothes washers, and mechanical cooling condensate, among other allowable sources.
 - Xeriscaping (landscaping that reduces or eliminates the need for irrigation), while still ensuring that heat island effects are mitigated
- Pool
 - Install a meter on the pool make-up line so water use can be monitored, and leaks can be identified and repaired
 - Pool splash troughs around the perimeter that drain back into the pool
 - Pool/Spa recirculating filtration equipment

- Reuse pool backwash water for irrigation
- Water-Saving Pool Filter
- Utilities
 - Individual metering and billing for water use for every commercial unit
 - Individual meters for water supply and water subsystems to analyze water demand and identify additional water savings by tracking water consumption
 - Allocate space and clearance to support non-potable water (purple pipe) infrastructure with a connecting port for future connection to a municipal recycled water system when made available.
- **Enforcement Agency:** Los Angeles Department of Water and Power; 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; once prior to Certificate of Occupancy
- **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures were identified in regard to utilities and service systems, specifically, water supply.