

EXHIBIT B

Mitigation Monitoring Program

CPC-2020-1511-VCU-SPR

CHAPTER 4 – MITIGATION MONITORING PROGRAM

1. Introduction

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State 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 Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

As the Lead Agency for the Project, the City of Los Angeles 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.
- 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 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) Mitigation Measures

AQ-MM-1: Construction Equipment Features: Harvard-Westlake School 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 50 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.
- During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment.
- During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485, and that haul trucks limit idling for loading activities to 5 minutes or less at any one location and unloading activities to 5 minutes or less at any one location.
- 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.

- Construction activities shall be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.
- **Enforcement Agency:** South Coast Air Quality Management District; 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 (provide proof of compliance); Periodically during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable demolition or grading permit (provide proof of compliance); Field inspection signoff

b) Biological Resources

(1) Project Design Features

BIO-PDF-1: Prior to the issuance of any grading permit that would remove potentially suitable nesting habitat for raptors or songbirds, Harvard-Westlake School shall demonstrate and guarantee to the satisfaction of the Los Angeles Department of City Planning that either of the following have been or shall be accomplished:

1. Vegetation removal activities will be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds.
 2. Any construction activities that occur during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist experienced in avian nesting bird behavior before commencement of clearing. If any active nests are detected, a buffer of 300 feet around the nest (500 feet for raptors), or as determined appropriate by the biologist based on species and site-specific conditions, will be delineated, flagged, and avoided until the nesting cycle is complete. The buffer may be modified and/or other recommendations proposed as determined appropriate by the biological monitor to minimize impacts.
- **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, prior to issuance of grading permit (provide proof of compliance); Periodically during field inspection
- **Action Indicating Compliance:** Field inspection signoff; compliance report by qualified consultant

BIO-PDF-2: Small wildlife permeable fencing will be installed along the edge of the Leased Property and the Zev Greenway in order to discourage human entry into the natural community plantings of the Zev Greenway. The fence design will allow unimpeded aesthetic views to the Los Angeles River, while allowing small wildlife to pass through or under the fencing. The fence design will support the goals of the Los Angeles River Revitalization Master Plan. Also, railing will be provided along the ADA-compliant pedestrian ramp leading from the Project Site to the Zev Greenway to discourage people from entering into the natural community plantings of the Zev Greenway. The fence design and railing will be reviewed by the City prior to installation.

- **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; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

BIO-PDF-3: Harvard-Westlake School will make available to the Zev Greenway trail users educational materials and signage at the entrance to the ADA-compliant pedestrian ramp located between the Project’s gymnasium and the Zev Greenway. The materials and signage will promote awareness that human activities, such as trail use, may impact or disturb wildlife use of open spaces. Educational materials and signage will explain how human activity, inclusive of noise and odors, may impact the natural habitats growing within the Zev Greenway, emphasizing the increased severity during breeding seasons. The signage will be submitted for review by the City for compliance with any applicable regulations and will also: 1) educate and inform the public about wildlife present in the area; 2) advise on proper use of the ramp in a manner respectful to wildlife; and 3) provide local contact information to report injured or dead wildlife. Signage will be written in the language(s) understandable by residents in the local vicinity and to those most likely to use the ramp. Signage will be made of materials not harmful to wildlife, avoiding glass or the use of spikes.

- **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; pre-operation
- **Monitoring Frequency:** Once at Project Plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

BIO-PDF-4: As part of the Project's routine maintenance program, Harvard-Westlake School will place a waste receptacle at the entrance to the Project's ADA-compliant pedestrian ramp located between the Project's gymnasium and the Zev Greenway in order to avoid or minimize the potential to create an attractive nuisance of an unnatural food source for wildlife. The receptacle will be regularly maintained to avoid waste materials inadvertently entering the Zev Greenway area.

- **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; post-construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once during field inspection
- **Action Indicating Compliance:** Plan check approval and submittal of compliance documentation by Applicant; Issuance of applicable building permit; Field inspection signoff

(2) Mitigation Measures

BIO-MM-1: Due to the presence of potentially suitable roosting habitat (ornamental trees) for special-status bat species (i.e., western yellow bat), Harvard-Westlake School shall demonstrate and guarantee to the satisfaction of the Los Angeles Department of City Planning that either of the following has been or shall be accomplished:

1. Tree removal activities shall be scheduled outside of the maternity roosting season (October 1 through February 28) to avoid potential impacts to special-status bat species during breeding season.
2. Any construction or palm tree removal activities that occur during the maternity roosting season for special-status bat species (March 1 through September 30) shall require a qualified biologist experienced with bat roost biology to conduct a pre-construction (or pre-tree removal) survey, using sonic bat detectors (e.g., Anabat) and night vision goggles for an emergence survey (for at least one-hour after sunset) to determine whether special status bat species are roosting within trees that would be removed. A qualified biologist is a biologist with specialized bat experience including the familiarity with bat roost biology (i.e., a professional biologist with a minimum of two years of bat survey experience, inclusive of acoustic survey experience). The surveys shall be conducted at dusk and after nightfall by a biologist. If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project activities shall be conducted as recommended by the biologist to avoid the area, which may include temporary postponement or provision of a suitable buffer established around the roost until

roosting activities cease. A report shall be submitted to the City with the results of the pre-construction or tree removal survey and any needed maternity roost avoidance actions prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats. If special-status bats are detected during the survey, a qualified bat specialist shall prepare species specific mitigation measures to reduce or avoid impacts to each special-status species detected. Mitigation may include avoidance through postponing or temporarily halting construction until maternal roost use is completed, use of construction buffers of no less than 100-feet, or the installation of bat boxes in proximity to detected maternal roosts. Avoidance measures shall be based on site-specific factors to prevent roost disturbances, including, but not limited to: numbers and locations of bats, proposed construction activities, height and distance of bat roosts from proposed construction activities, the presence of visual and/or acoustic barriers between the roost and proposed activities, and the pre-existing level of human activities (e.g., ambient noise, potential movement, etc.) to which the bats may already tolerate.

3. If special-status bats are not detected, but the bat specialist nonetheless determines that roosting bats may be present at any time of year and could roost in trees at a given location, tree removal activities shall be initiated by pushing trees using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimal warning to any roosting special-status bats that may be present, trees shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.

- **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, prior to issuance of grading permit (provide proof of compliance); Periodically during field inspection
- **Action Indicating Compliance:** Field inspection signoff; Compliance report by qualified consultant

BIO-MM-2: Prior to issuance of a building permit, Harvard-Westlake School shall submit to the Department of City Planning a landscape plan or mitigation plan depicting replacement of an equivalent acreage of California brittlebush scrub removed at a 1:1 ratio. The sensitive natural community does not need to be dominated only by California brittlebush, but this species shall be prevalent within the community, and the native scrub mix proposed shall use similar species as used for the Zev Greenway restoration habitat. The replacement of sensitive natural community habitat shall be planted clustered adjacent to and contiguous with the Zev Greenway, and the locations and species shall be to the satisfaction of the Department of City Planning and in conformance with the

landscape and planting guidelines in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Replacement sensitive natural community habitat areas shall be planted on-site and shall be shown on the Project's landscape plan. The restored sensitive natural community shall be monitored for five years to verify that California brittlebush scrub has been successfully restored with the survival of the plants depicted in the approved landscape plan at the conclusion of the five years of monitoring.

- **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 City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once, prior to issuance of building permit (provide proof of compliance); Periodically during field inspection
- **Action Indicating Compliance:** Issuance of applicable building permit; Field inspection signoff; Compliance report by qualified consultant

BIO-MM-3: Prior to issuance of a building permit, Harvard-Westlake School shall submit to the Department of City Planning and/or the City's Urban Forestry Division a landscape plan or tree plan depicting replacement of each "non-protected" significant tree removed at a minimum 1:1 ratio. The actual mitigation requirement may be modified by the Department of City Planning and/or the City's Urban Forestry Division dependent on their view of dead tree removals and removal of Mexican fan palms. The replacement tree locations and species shall be to the satisfaction of the Department of City Planning and/or the City's Urban Forestry Division and in conformance with the landscape and planting guidelines in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Replacement trees shall be planted in the Biological Study Area as shown on the Project's landscape plan. The three pine trees within the area proposed for the Coldwater Canyon Avenue Riverwalk Path Ramp shall also remain in place.

Removal of 31 public street trees shall require a tree removal permit and mitigation plantings, which is typically a ratio of 2:1.

A monitoring report shall be prepared by a Tree Expert (as defined in LAMC Section 17.02) and submitted to the Department of City Planning and/or City's Urban Forester within one-month following the completion of Project construction. After three years following the completion of Project construction, a Tree Expert (as defined in LAMC Section 17.02) shall assess the health and overall condition of all replacement trees. If any of the on-site, off-site or public street trees die within three years as a consequence of construction, they shall be replaced.

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

- **Monitoring Agency:** City of Los Angeles Department of Planning; City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once, prior to issuance of building permit (provide proof of compliance); Periodically during field inspection
- **Action Indicating Compliance:** Issuance of applicable building permit; Field inspection signoff; Compliance report by qualified consultant

c) Cultural Resources

(1) Project Design Features

CUL-PDF-1: Rehabilitation Plan. A Rehabilitation Plan will be prepared as part of the Project to ensure appropriate treatment and protection of the identified character-defining features on the Project Site. This includes the appropriate treatment of the golf ball-shaped light standards during relocation, and documentation that the rehabilitation of the clubhouse, putting green, and low brick wall with weeping mortar complies with the Secretary of the Interiors Standards for Rehabilitation (the Standards). Standards compliance is required by the City of Los Angeles Cultural Heritage Ordinance for properties that are designated Historic-Cultural Monuments (Los Angeles Administrative Code, Section 22.171.14). The Project team will include a historic architect or qualified historic preservation consultant who meets the Secretary of the Interior's Professional Standards in Architectural History or Historic Architecture. The Rehabilitation Plan will be submitted for review and approval by the Department of City Planning, Office of Historic Resources. At a minimum, the Rehabilitation Plan will address the following:

- Appropriate measures for the relocation of the golf ball-shaped light standards.
- Appropriate measures for protecting all identified character-defining features of the Project Site during construction activity. If necessary, a physical barrier (e.g., exclusion or cyclone fencing) will be erected to separate and protect the clubhouse, and other features as needed, during construction. Vibratory rollers will not be used on the Project Site within 40 feet of the clubhouse and low brick wall with weeping mortar. Large dozers (300 horsepower and greater) and caisson drills will not be used on the Project Site within 25 feet of the clubhouse, putting green, and low brick wall with weeping mortar; loaded trucks will not be used on the Project Site within 20 feet of the clubhouse, putting green, and low brick wall with weeping mortar; and jackhammers will not be used on the Project Site within 12 feet of the clubhouse, putting green, and low brick wall with weeping mortar.
- Retention and appropriate treatment of the significant characteristics of the original Ranch-style architecture and the relationship of the clubhouse within the context of the Project Site overall and its relationship to other character-defining features on the Project Site and in the surrounding neighborhood. This includes retaining the clubhouse in its historic location and maintaining the significant features that have collectively served as the public face of the Project Site since the 1950s as

identified in the Historical Report, including: the clubhouse’s angled position facing Whitsett Avenue and Valley Spring Lane; the existing setback; the relationship of the clubhouse and the putting green; the mature trees; the golf ball-shaped light standards; and the low brick wall.

- Retention and rehabilitation of the distinctive features of the exterior of the clubhouse, including its original Ranch-style plan, massing, and original architectural details as identified in the Historical Report. The Project is not proposing significant additions to the clubhouse, or alterations to the building that would obscure or remove important exterior features.
 - Retention and rehabilitation of the distinctive original features of the interior of the clubhouse as identified in the Historical Report.
- **Enforcement Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources; City of Los Angeles Department of Building and Safety
 - **Monitoring Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once, prior to issuance of a building permit (provide proof of compliance)
 - **Action Indicating Compliance:** Submittal and approval of the Rehabilitation Plan to the City of Los Angeles Department of City Planning’s Office of Historic Resources

CUL-PDF-2: Documentation. In order to memorialize the extant features of the Project Site prior to implementation of the Project, the Project Site will be documented according to Historic American Buildings Survey (HABS) Level III standards to include: sketch plan; a maximum of 40 photographs with large-format negatives that document the Project Site overall and the relationship of the features on the Project Site, exterior and significant interior spaces of the clubhouse, views of the associated putting green and low brick wall, and golf ball-shaped light standards; and short form historical report. The documentation will be reviewed and approved by the Department of City Planning, Office of Historic Resources. The documentation will be retained on-site, and digital copies will be offered to the following repositories: Los Angeles Public Library, Los Angeles Office of Historic Resources, and San Fernando Valley Historical Society.

- **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 Office of Historic Resources
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once, prior to issuance of a building permit (provide proof of compliance)

- **Action Indicating Compliance:** Submittal of compliance documentation to the City of Los Angeles Department of City Planning Office of Historic Resources (provide proof of compliance)

CUL-PDF-3: Interpretation. Harvard-Westlake School will prepare interpretation of the history of the Project Site to be housed on-site. The interpretive program may be housed in the clubhouse and may include historic photographs or other ephemeral materials documenting the history of the Weddington family, the development of the San Fernando Valley, and the history of the Project Site as a postwar recreational facility. A digital copy of the interpretive materials will be provided to the Department of City Planning, Office of Historic Resources and may also be made available to interested parties.

- **Enforcement Agency:** City of Los Angeles Department of City Planning Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning 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 compliance documentation to the City of Los Angeles Department of City Planning Office of Historic Resources (provide proof of compliance)

d) Greenhouse Gas Emissions

(1) Project Design Features

GHG-PDF-1: Solar Voltaic System. The Project will be designed to include solar voltaic panels providing 281,000 kilowatt-hours (kWh) per year on the roof of the gymnasium that would reduce the amount of electricity demand from City utilities.

- **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; Once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

e) Hazards and Hazardous Materials

(1) Project Design Features

HAZ-PDF-1: Artificial Turf Formulation. The artificial turf fiber, backing, and underlayment installed on the Project Site will not have a lead concentration level higher than 50 parts per million as determined using a testing protocol in accordance with U.S. Environmental Protection Agency Method 30508; U.S. Environmental Protection Agency Method 6010c or alternatively Method 6020A will be used to analyze digestate.

- **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; Once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

(2) Mitigation Measures

HAZ-MM-1: Soil Management Plan. Prior to the issuance of grading permits, Harvard-Westlake School shall retain a qualified environmental consultant to prepare a Soils Management Plan (SMP), which shall be submitted to the Los Angeles Department of Building and Safety (LADBS) and Los Angeles Regional Water Quality Control Board (LARWQCB), as necessary, for review and approval. The SMP shall specify soil testing parameters and sampling frequency for areas within the golf course and near the location of the 500-gallon UST removed from the Project Site in 1995. Sampling, testing, and analysis shall be conducted in accordance with appropriate California and local guidelines [e.g., Department of Toxic Substances Control (DTSC), California Environmental Protection Agency (CalEPA), and LARWQCB]. Any soils qualifying as hazardous waste and/or soils that include concentrations of chemicals that exceed applicable State Office of Environmental Health Hazard Assessment (OEHHA) California Human Health Screening Levels (CHHSL), shall be subject to site-specific soil removal, treatment, and disposal measures included in the SMP to comply with applicable federal, State, and local overseeing agencies requirements to prevent unacceptable exposure of hazardous materials to construction workers, the environment or the public from contaminated soils or soil vapors during construction. The SMP shall also include, but is not limited to, protocols that address the following: screening measures for soil exhibiting impacts, stockpile management, vapor suppression and dust control, surface and groundwater protection, soil stockpile sampling, and exporting of contaminated soils. Upon completion of construction-related soil disturbing activities, Harvard-Westlake School shall obtain a closure letter(s) or No Further Action (NFA) letter from the LADBS, DTSC, LARWQCB, and/or other local or State agencies, as applicable, which states that no further soils testing or remediation is required on the Project Site, including near the former 500-gallon UST that was removed from the Project Site in 1995 just south of the tennis courts near

the adjacent LAFD site boundary. The closure letter and/or NFA letter(s) shall at a minimum address the on-site area, including the previously removed 500-gallon UST.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; Los Angeles Regional Water Quality Control Board; Department of Toxic Substances Control, California Environmental Protection Agency
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to issuance of a grading permit; Construction (during soil-disturbing activities)
- **Monitoring Frequency:** Once at Project plan check prior to issuance of grading permit; Ongoing with periodic field inspections during construction if impacted material is discovered
- **Action Indicating Compliance:** Issuance of grading permit; Field inspection signoff; Closure letter and/or NFA letter(s), as needed

HAZ-MM-2: Health and Safety Plan (HASP): Harvard-Westlake School shall commission a HASP to be prepared in compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards (29 CFR 1910.120) and Cal/OSHA requirements (8 CCR, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review and approval by the LADBS. The HASP shall address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that contaminated soils or elevated levels of subsurface vapors are encountered during grading and excavation. The general contractor shall be responsible for health and safety concerns not related to contaminated soils or soil vapors, such as those associated with standard construction operations (e.g., excavation stability, stockpile placement, heavy equipment operation, etc.).

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to issuance of a demolition or grading permit; Construction (during soil-disturbing activities)
- **Monitoring Frequency:** Once at Project plan check prior to issuance of demolition or grading permit; Ongoing with periodic field inspections during construction
- **Action Indicating Compliance:** Issuance of demolition or grading permit; Field inspection signoff

f) Noise

(1) Project Design Features

NOI-PDF-1: The Project will include sections of solid walls and an overhead canopy above the bleachers at the west side of the swimming pool that will reduce noise associated with the athletic activities to the adjacent residences, as follows:

- An 8- to 10-foot-high wall along portions of the northeastern and eastern sides of Field A.
 - An 8- to 11-foot-high wall along portions of the western and northern sides of Field B.
 - A 14.5-foot solid overhead canopy above the swimming pool bleachers.
 - An 8-foot-high solid wall along the northern edge of the tennis courts.
- **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; Pre-operation
 - **Monitoring Frequency:** Once at Project plan check; Once during field inspection
 - **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

NOI-PDF-2: The Project's amplified sound system for special events at Field A will be installed and designed using a line-array speaker system, so as to not exceed a maximum noise level of 92 dBA (L_{eq}) at a distance of 50 feet from the amplified sound system. In addition, the stage for special events will be located at the north side of Field A, with the amplified sound system facing south in the opposite direction from the off-site sensitive uses to the north of Field A, which would reduce speaker noise at the nearest off-site sensitive uses to the north and east of Field A.

- **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; Pre-operation
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

NOI-PDF-3: Project construction will be limited to Monday through Friday between 7:00 a.m. and 6:00 p.m.; and Saturdays between 8:00 and 6:00 p.m., which is within the allowable hours per Los Angeles Municipal Code Section 41.40.

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

- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off; Compliance report by Applicant

NOI-PDF-4: Harvard-Westlake will have no more than 30 school-related special events with the following limitations on attendance: no more than 27 special events per year of up to 500 people and no more than three (3) special events per year of up to 2,000 people.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance:** Compliance report by Applicant

(2) Mitigation Measures

NOI-MM-1: 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 adjacent noise sensitive uses.

- Along the Project’s western property line. The noise barrier shall provide minimum 15-dBA noise reduction (minimum 16 feet high) at the residences adjacent to the Project Site to the west (receptor location R1).
- Along the Project’s northern property line. The noise barrier shall provide minimum 15-dBA noise reduction (minimum 16 feet high) to the residences to the north (receptor locations R2, R3, and R4).
- Along the Project’s eastern property line. The noise barrier shall provide minimum 12-dBA (minimum 12 feet high) noise reduction to the residences and church to the east (receptor locations R5 and R6).
- Along the south side of the Project’s construction area to block the line-of-sight between the construction equipment and the receptor location R7. The noise barrier shall provide minimum 8-dBA noise reduction to the receptor location R7.

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 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; 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

NOI-MM-2: Construction equipment that would generate high levels of noise and vibration 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 natural and/or manmade barriers (e.g., intervening construction trailers) 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:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-offs

NOI-MM-3: The Project contractor shall use power construction equipment with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. In addition, no impact pile driving shall be utilized; augered or drilled piles are permitted. 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; Field inspection sign-offs

g) Police Protection

(1) Project Design Features

POL-PDF-1: Security Features During Construction. During construction, on-site security measures will include security lighting and a construction security fence with gated and locked entry around active construction areas.

- **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

POL-PDF-2: Security Features During Operation. During operation, the Project will incorporate a security program to ensure the safety of its students, employees, and spectators, as well as public users of the Project Site. The Project’s security will include, but not be limited to, the following design features:

- Construction of three security kiosks: (1) a security kiosk constructed south of the tennis courts; (2) a security kiosk located in the underground parking structure; and, (3) a security kiosk located in proximity to the roundabout and at-grade parking.
 - Security personnel would be present onsite 24 hours per day every day of the year, and range in numbers from two to as many as ten guards depending on the time of day and number of scheduled activities.
 - One security person would be stationed at the underground garage security kiosk throughout business hours. Patrols would be conducted at random during each guard’s eight-hour shift.
 - Security patrols present north of the Project Site on Valley Spring Lane during events to enforce no neighborhood or other off-site parking or visitor drop-off.
 - Security guard placed at the pedestrian entrance on Whitsett Avenue during larger events (i.e., days on which the number of event/game attendees is expected to be 300 or more for any individual game, or concurrent games combined) to screen visitors for neighborhood parking and to return visitors to their car if inappropriately parked.
 - Lighting would be provided along all pathways, around the Project’s gymnasium building, in the surface parking area, and in entrance areas for security and wayfinding purposes. As required by LAMC Section 93.0117(b), exterior light sources would be designed such that they would not cause more than two foot-candles of lighting intensity or generate direct glare onto nearby sensitive uses (i.e., residential uses).
 - North Hollywood Community Police Station would be provided with diagrams showing access to each portion of the Project Site.
 - Installation of and monitoring of closed-circuit television (CCTV) cameras.
- **Enforcement Agency:** City of 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; Post-construction
 - **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

h) Transportation

(1) Project Design Features

TRAF-PDF-1: Construction Management Plan. Prior to the issuance of any demolition permit or building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
 - Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction.
 - Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.
 - Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
 - Prohibit construction worker and equipment parking on the adjacent residential streets.
- **Enforcement Agency:** City of Los Angeles Department of Transportation, 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 Transportation; City of Los Angeles Department of Building and Safety
 - **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 Traffic Management Plan from the Los Angeles Department of Transportation prior to issuance of applicable demolition or building permit; Field inspection sign-offs

TRAF-PDF-2: A flashing red warning light(s) will be installed on the southern exit driveway within the Project Site at a point located before vehicles reach Valleyheart Drive that will hold back vehicles exiting the Project Site roundabout onto Valleyheart Drive. This warning light will be activated by a remote-control button pressed by LAFD staff in the emergency vehicle when an emergency vehicle is approaching Valleyheart Drive from Whitsett Avenue or exiting from the eastern LAFD driveway on Valleyheart Drive.

- **Enforcement Agency:** Los Angeles Fire Department; 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 applicable building permit; Field inspection signoff

TRAF-PDF-3: On days in which event attendance is expected to surpass 300 spectators, including parents and other spectators, students will not be permitted to drive to the Project Site and will be required to use Harvard-Westlake School's shuttle service. Shuttles will follow a prescribed driving route, travelling northbound on Coldwater Canyon Avenue, turning right at Moorpark Street, and turning right onto Whitsett Avenue. Spectators will park on the Project Site, and tickets and parking passes will be required to enter the Project Site. Spectators without a parking pass will be directed to park on Harvard-Westlake's Upper School campus and ride Harvard-Westlake School-provided shuttles to the Project Site. Parking in the neighborhood will not be permitted and will be enforced by security personnel.

A Parking and Transportation Management Plan will be employed by Harvard-Westlake School for all athletic competitions or Special Events that are expected to draw more than 300 attendees. The Parking and Transportation Management Plan will include appropriate tools to manage and control traffic and parking for competitions or events so that impacts to the surrounding areas are minimized. Potential measures will include, but are not limited to, left-turn prohibition on Special Event days, a parking reservation system to manage attendance, off-site parking at the Harvard-Westlake Upper School campus, attendant-assisted parking, temporary increases in traffic management and parking personnel as needed, use of security personnel, signage, and other measures. This Plan will be submitted to LADOT for review and approval prior to the issuance of a Certificate of Occupancy for the Project. The Plan will be monitored for a minimum of

three (3) years with annual monitoring reports submitted by the Harvard-Westlake School to LADOT for review.

- **Enforcement Agency:** City of Los Angeles Department of Transportation, 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 Transportation, City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction, Post-construction
- **Monitoring Frequency:** Once, prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Compliance report by Applicant

i) Utilities and Services Systems - Water Supply

(1) Project Design Features

WS-PDF-1: Artificial Turf. The Project will use artificial turf on Fields A and B, which would serve to reduce water demand compared to natural grass.

- **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; Once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

WS-PDF-2: Capture and Reuse System. The Project would capture, treat, and store up to 350,000 gallons of stormwater from the developed portions of the Project Site through a stormwater Low Impact Development (LID) capture and reuse cistern system, which will then use the treated stormwater for irrigation on the Project Site.

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

j) Utilities and Services Systems - Wastewater**(1) Mitigation Measures**

WW-MM-1: The swimming pool volume shall be discharged at a rate of no more than 166,000 gallons per day.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety, LA Sanitation & Environment
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off; Compliance report by Applicant

WW-MM-2: The Project shall split the wastewater flow from the discharge of the swimming pool (50 percent of the resulting volume) into the 8-inch lines on Bellaire Avenue and Whitsett Avenue, unless an alternative split is otherwise approved by LASAN based on future detailed gauging and evaluation as part of the final approval process for the sewer capacity and connection permit.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety, LA Sanitation & Environment
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Pre-operation
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable sewer capacity and connection permit; Field inspection sign-off

EXHIBIT “B”

Page No. 22 of 22

Case No. CPC-2020-1511-VCU-SPR

4. Mitigation Monitoring Program

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