

# MITIGATION MONITORING AND REPORTING PROGRAM

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## 1. Purpose

Section 21081.6 of the Public Resources Code 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” (Mitigation Monitoring and Reporting Program).

Section 15097 of the *CEQA Guidelines* provides additional direction on mitigation monitoring or reporting):

### **15097. MITIGATION MONITORING OR REPORTING.**

*(a) This section applies when a public agency has made the findings required under paragraph (1) of subdivision (a) of Section 15091 relative to an EIR or adopted a mitigated negative declaration in conjunction with approving a project. In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall 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. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which 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.*

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

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

The MMRP is subject to review and approval by the Lead Agency as part of the certification of the SCEA and adoption of project conditions. The required PDFs, corrective measures and MMs are listed and categorized by impact area, as identified in the SCEA, with an accompanying identification of the following:

- Monitoring Phase, the phase of the Project during which the mitigation measure shall be monitored;
  - Pre-Construction, including the design phase
  - Construction
  - Pre-Occupancy (prior to issuance of a Certificate of Occupancy)
  - Occupancy (post-construction)
- Enforcement Agency, the agency with the power to enforce the mitigation measure;
- Monitoring Agency, the agency to which reports including feasibility, compliance, implementation, and development are made;
- Monitoring Frequency, the frequency at which the mitigation measure shall be monitored; and
- Action(s) Indicating Compliance, the action(s) of which the Enforcement or Monitoring Agency indicates that compliance with the identified mitigation measure has been implemented.

## **2. Administrative Procedures and Enforcement**

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

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs, corrective measures 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, corrective measures and MMs during construction every 90 days in a form satisfactory

to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the PDFs, corrective measures and MMs within two business days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

### **3. Program Modification**

After review and approval of the final MMRP by the Lead Agency, minor changes and modifications to the MMRP 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 MMRP and the need to protect the environment. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs, corrective measures and MMs contained in this MMRP. The enforcing departments or agencies may determine substantial conformance with PDFs, corrective measures and MMs in the MMRP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF, corrective measure 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, corrective measures or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF, corrective measure or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF, corrective measure 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, corrective measure 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, corrective measure or MM results in a substantial change to the Project or the non-environmental conditions of approval.

## **4. Mitigation Monitoring and Reporting Program**

### **III. AIR QUALITY**

#### **MITIGATION MEASURES**

**MM-AQ-1.** All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 3 emission standards, to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions at the Project Site.

In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

During plan check, the Project Applicant shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower that shall be used during any portion of demolition/excavation activities and concrete pour days for the foundation for the Project. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and CARB or SCAQMD operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet Tier 4 CARB/U.S. EPA standards.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

## **V. CULTURAL RESOURCES**

### **MITIGATION MEASURES**

**CULT-MM-1:** Retain a Qualified Archaeologist. Prior to the issuance of a demolition permit, the project proponent shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's (SOI) Standards for professional archaeology, during the excavation phase to carry out and ensure proper implementation of the mitigation measures related to archaeological resources. The qualified archaeologist shall submit a letter of retention to the project proponent no fewer than 15 days before demolition or excavation activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the SOI standards.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
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<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**CULT-MM-2: Prepare an Archaeological Resources Monitoring and Mitigation Plan (ARMMP).** Prior to the commencement of demolition and excavation, an ARMMP shall be prepared. The ARMMP shall include, but not be limited to, a construction worker training program (described in CULT-MM-3), monitoring protocol for demolition and excavation activities, discovery and processing protocol for inadvertent discoveries of archaeological resources, and identification of a curation facility should artifacts be collected. The ARMMP shall identify areas that require monitoring, provide a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving archaeological remains are present, and include a protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate. The duration and timing of the monitoring shall be determined based on the rate of excavation, geoarchaeological assessment, and, if present, the quantity, type, and spatial distribution of archaeological resources identified.

The ARMMP shall minimally include a historical context statement, research design, and methodology by which any newly identified archaeological sites will be evaluated for CRHR eligibility and as unique archaeological resources. The ARMMP will specify the specific types of archaeological sites likely to be encountered, the means by which significance will be assessed. If any archaeological resources are identified and are found not to be significant or do not retain integrity, then they will be recorded to a level sufficient to document the contents and condition. The ARMMP shall include a proactive identification and documentation protocol that would facilitate preservation or mitigation of impacts to any archaeological sites identified in a cost-effective manner. The ARMMP will include potential treatment plans to be implemented in the event a newly discovered archaeological 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 PRC 21083.2(g). The ARMMP will require that if the treatment plans outlined therein are found to be infeasible or other alternatives are proposed, the qualified archaeologist shall coordinate with the project proponent and City Planning to amend the ARMMP with a formal treatment plan that would reduce impacts to the resource(s). The treatment plans

stated in the ARMMP or prepared after the discovery of a historical 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 and if it is determined avoidance is not feasible, treatment may include but not be limited to any of the following depending on the type of resource and the significance evaluation:

- **Prehistoric archaeological sites.** Data recovery shall be conducted (i.e., excavation, laboratory processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant where significance is determined under CRHR Criterion 4 and integrity is retained.
- **Historic-period archaeological sites.** If a Historic-period site, including but not limited to a refuse scatter or building foundation(s), is present and found to retain integrity, data recovery shall be conducted (i.e., excavation, laboratory processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant. In addition to data recovery, specific treatments shall be developed and implemented based on potential CRHR or eligibility criteria or as a unique archaeological resource as follows:
  - **Treatment Under Criteria 1 and 2, or as a unique archaeological resource:** Treatment shall include interpretation for the public. Interpretive materials may include, but not be limited to, signage at the Project Site, relocating preserved materials in a publicly accessible display, or visual representations of recovered materials. The interpretive materials shall be prepared, at the expense of the project applicant, by professionals meeting the Secretary of the Interior standards in history or historical archeology. The details of the interpretive materials, including the form, content, and timing of their preparation, shall be completed to the satisfaction and subject to the approval of the Department of City Planning. The results of the historical and archaeological studies conducted for the Project shall be made available to the public through repositories such as the local main library branch or identified non-profit historic groups interested in the subject matter.
  - **Treatment Under Criterion 3:** Architectural documentation of exposed features shall be conducted by producing narrative records, measured drawings, and photographs in conformance with HAER standards prior to any alteration or demolition activity.
  - **Treatment Under Criterion 4:** No additional work; data recovery is sufficient.

The ARMMP shall summarize the requirements for tribal coordination in the event of an inadvertent discovery of Native American archaeological resources, including the applicable regulatory compliance measures or conditions of approval for the inadvertent discovery of tribal cultural resources to be carried out in concert. The ARMMP shall be prepared in compliance with Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**CULT-MM-3: Worker Environmental Awareness Program (WEAP) Training.** Before the commencement of initial demolition or excavation at the Project Site, the retained qualified archaeologist or their designee shall provide a WEAP training to on-site project personnel responsible for supervising demolition and excavation (i.e., foreman or supervisor) and machine operators. The WEAP training shall brief construction crews regarding the regulatory compliance requirements and applicable mitigation measures that must be adhered to during demolition and excavation activities for the protection of archaeological resources. As an element of the WEAP training, the qualified archaeologist or their designee shall advise the construction crews on proper procedures to follow if an unanticipated archaeological resource is discovered during construction. The qualified archaeologist or their designee shall also provide the construction workers with contact information for the qualified archaeologist and their designee(s) and protocols to follow if inadvertent discoveries are made. In addition, workers shall be shown examples of the types of archaeological resources that would require notification of the archaeologist, if encountered. Once the ground disturbances have commenced, the need for additional or supplemental WEAP training shall be determined through consultation with the qualified archaeologist, project proponent or their designated project supervisor. Within five days of completing a WEAP training, a list of those in attendance shall be provided by the qualified archaeologist to the project proponent.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
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<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**CULT-MM-4: Monitoring for Archaeological Resources.** Before the commencement of demolition or excavation activities, an archaeological monitor shall be present during ground disturbing activities as stipulated in the ARMMP. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction. The monitor shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially significant archaeological resources, as determined by the qualified archaeologist. The monitor shall complete a daily log documenting construction activities and observations. The field observations shall include assessment of the geoarchaeological setting and whether sediments are identified that are no longer capable or unlikely to contain archaeological material (i.e., sterile), which may be encountered prior to reaching the total depth of excavation expected for the project. If initial archaeological monitoring identifies low archaeological sensitivity (i.e., sterile soil strata) below a certain depth or within a certain portion of the Project Site, a corresponding reduction of monitoring coverage would be appropriate. In the event that potentially significant archaeological resources are exposed during construction, work in the immediate vicinity of the find (within 8 meters [25 feet]) shall stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas in coordination with the qualified archaeologist. If the discovery 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 PRC 21083.2(g), and the treatments proposed in the ARMMP are found to be infeasible or other alternatives are proposed, the qualified archaeologist shall coordinate with the project proponent and the Department of City Planning to amend the ARMMP with a formal treatment plan that would reduce impacts to the resource(s). The treatment plan established for the resource(s) 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 and if it is determined avoidance is not feasible, treatment may include architectural documentation and archaeological data recovery (i.e., excavation, laboratory



processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant.

Within 30 days of concluding the archaeological monitoring, the qualified archaeologist shall prepare a memo stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memo shall be submitted to the project proponent and the Department of City Planning. Following submittal of the memo, the qualified archaeologist shall prepare a technical report documenting the methods and results of all work completed under the ARMMP, including, if any, treatment of archaeological materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the California Register of Historical Resources. Once laboratory analysis is complete, any recovered archaeological materials shall be curated at a public, non-profit research institution that will ensure their long-term preservation and allow access to interested scholars and shall be done at the expense of the project applicant. Should no such institutions accept the materials, they shall be donated to an educational institution or historical society. The format and content of the report shall follow the California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format. Any archaeological resources identified shall be documented on appropriate California Department of Parks and Recreation 523-Series Forms. The report shall be prepared under the supervision of a qualified archaeologist and submitted to the Department of City Planning within 12 months of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

## **VI. ENERGY**

### **PROJECT DESIGN FEATURES**

**ENERGY-PDF-1:** The Project shall not include natural gas-fueled fireplaces in the proposed residential units.

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<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**ENERGY-PDF-2:** The Project shall provide vehicle parking spaces that would be pre-wired and capable of accommodating EV charging stations in accordance with Ordinance No. 186,485.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**ENERGY-PDF-3:** Windows would be included in all living units and common spaces for natural daylight, reducing the need for overhead lighting impacting the need for electricity. High-performance dual-pane windows and exterior materials would be used in order to reduce the need for energy driven mechanical systems.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**ENERGY-PDF-4:** Active energy conservation strategies would include implementing LED lighting with daylighting controls and dimming capabilities, installing motion detector controls for all circulation and auxiliary spaces, providing Energy Star qualified appliances.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**ENERGY-PDF-5:** High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**ENERGY-PDF-6:** Showerheads with a flow rate of 1.5 gpm or less.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**ENERGY-PDF-7:** Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**ENERGY-PDF-8:** Drip/subsurface irrigation (micro-irrigation)

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**ENERGY-PDF-9:** Micro-spray

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**ENERGY-PDF-10:** Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**ENERGY-PDF-11:** Drought-tolerant plants – 50 percent of total landscaping

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

## **VII. GEOLOGY AND SOILS**

### **MITIGATION MEASURES**

**GEO-MM-1:** Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project Sites. In addition, in the event that paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a qualified paleontologist can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Site. If the resource is found to be significant, recommendations would include a preparation of a Treatment Plan, which would require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with state law.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
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**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**VIII. GREENHOUSE GAS EMISSIONS**

**PROJECT DESIGN FEATURES**

**GHG-PDF-1:** The Project shall prohibit the use of natural gas-fueled fireplaces in the proposed live/work units.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-2:** The Project shall provide filtered outside air supply sufficient to meet American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE) 62.1 standards.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-3:** Participation in fundamental refrigerant management to preclude the use of chlorofluorocarbons (CFCs) in heating, cooling, and ventilation (HVAC) systems.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-4:** Use of adhesives, sealants, paints, finishes, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-5:** Installation of a Low Impact Development (LID) compliant on-site stormwater treatment system, capable of treating the volume of stormwater runoff from a local 85<sup>th</sup> percentile storm event.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety and Department of Public Works

**Monitoring Agency:** Department of Building and Safety and Department of Public Works

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-6:** Installation of pre-treatment stormwater infrastructure for the stormwater runoff tributary to the on-site stormwater treatment system.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety and Department of Public Works

**Monitoring Agency:** Department of Building and Safety and Department of Public Works

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-7:** During construction of the Project, best management practices (BMPs) would be implemented to control stormwater runoff and minimize pollutant loading and erosion effects.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety and Department of Public Works

**Monitoring Agency:** Department of Building and Safety and Department of Public Works

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-8:** During operation, BMPs would be implemented to minimize pollutant loading in stormwater runoff.

**Monitoring Phase:** Construction and Operation

**Enforcement Agency:** Department of Building and Safety and Department of Public Works



**Monitoring Agency:** Department of Building and Safety and Department of Public Works

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction and operation

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-9:** Contractors would reference Partnership for Advancing Technology in Housing (PATH) and other current references for state-of-the-art construction methods, materials, and mechanical equipment and utilize same methods where applicable.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-10:** Recycling and reuse of building and construction materials to the maximum extent feasible, including the on-site recycling and reuse of concrete removed during demolition and salvaging of existing appliances and fixtures.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-11:** Use of sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-12:** 15 percent of the roof area shall be set aside for future solar panels.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-13:** Waste diversion accounting shall be utilized.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-14:** Installation of a “cool roof” that reflects the sun’s heat and reduces urban heat island effect.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-15:** At least 50 percent of construction and demolition debris from Project construction would be diverted from landfills.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-16:** Provide on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-17:** Use of locally (within 500 miles) manufactured construction materials and of building materials with recycled content, where possible.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety  
**Monitoring Frequency:** Once, at Plan Check.  
 Ongoing, during construction  
**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-18:** Provision of EV charging stations in the parking structure in compliance with Ordinance No. 186,485

**Monitoring Phase:** Pre-Construction; Construction  
**Enforcement Agency:** Department of Building and Safety  
**Monitoring Agency:** Department of Building and Safety  
**Monitoring Frequency:** Once, at Plan Check.  
 Ongoing, during construction  
**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-19:** Provision of parking spaces that are capable of supporting future electric vehicle charging equipment in compliance with Ordinance No. 186,485.

**Monitoring Phase:** Pre-Construction; Construction  
**Enforcement Agency:** Department of Building and Safety  
**Monitoring Agency:** Department of Building and Safety  
**Monitoring Frequency:** Once, at Plan Check.  
 Ongoing, during construction  
**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-20:** Installation of Energy Star-labeled products and appliances, where appropriate.

**Monitoring Phase:** Pre-Construction; Construction  
**Enforcement Agency:** Department of Building and Safety  
**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-21:** Meeting or exceeding Title 24, Part 6, California Energy Code baseline standard requirements for energy efficiency, based on the 2016 Energy Efficiency Standards requirements. Examples of design methods and technologies that could be implemented may include but would not be limited to high-performance glazing on windows, appropriately-oriented shading devices, high-efficiency boilers (if single metered); instantaneous water heaters (if individual meters), and enhanced insulation to minimize thermal gain.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-22:** Application of energy-saving lighting technologies and components to reduce the Project's electrical usage profile. Examples of these components include occupancy-sensing controls (where applicable), use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies where appropriate, and exterior lighting controlled by photo sensor and/or timeclocks to ensure safety and visibility while preventing unnecessary energy usage.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**GHG-PDF-23:** Commissioning of building energy systems to verify that the Project's building energy systems are installed, calibrated, and performing to the Owner's Project requirements.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**GHG-PDF-24:** Water conservation measures shall include:

- High-efficiency toilets (with flush volume of 1.06 gallons of water per flush or less) throughout, including ultra-low-flow urinals in all nonresidential restrooms, as appropriate.
- Residential lavatory faucets with a maximum flow rate of 1.2 gallons per minute and kitchen faucets with a maximum flow rate of 1.5 gallons per minute.
- High-efficiency washers, whether within individual units (with water factor of 6.0 or less) and/or in common laundry rooms (commercial washers with water factor of 7.5 or less). Equipment is required to be Energy Star-certified.
- High-efficiency dishwasher within individual units, using 3.5 gallons per cycle or less. Equipment is required to be Energy Star-certified.
- No-flush or waterless urinals in all nonresidential restrooms as appropriate.
- Nonresidential lavatory faucets with a maximum flow rate of 0.4 gallon per minute and of a self-closing design (i.e., that would automatically turn off when not in use).
- Nonresidential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute. Restaurant kitchen faucets shall have pre-rinse self-closing spray heads with a maximum flow rate of 1.6 gallons per minute.

- Installation of tankless and on-demand water heaters in commercial kitchens and restrooms, where appropriate.
- Water-saving pool filter.
- Pool/spa recirculating filtration equipment.
- Pool splash troughs around the perimeter that drain back into the pool.
- Leak detection system for swimming pools and Jacuzzi.
- Minimum irrigation system distribution uniformity of 75 percent.
- Use of proper hydro-zoning, turf minimization, zoned irrigation and use of native/drought-tolerant plant materials.
- Use of landscape contouring to minimize precipitation runoff.
- Use of landscape contouring to minimize precipitation runoff.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety and Department of Public Works
<b>Monitoring Agency:</b>	Department of Building and Safety and Department of Public Works
<b>Monitoring Frequency:</b>	Once, at Plan Check.  Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

## IX. HAZARDS AND HAZARDOUS MATERIALS

### MITIGATION MEASURES

**HAZ-MM-1:** During excavation of the Project Site for the subterranean parking garage and prior to issuance of a Building Permit, if a UST is encountered, the Project Applicant shall procure a Division 5 Permit from the Los Angeles County Fire Department for removal of a UST and shall comply with the requirements of the permit.

**Monitoring Phase:** Pre-Construction; Construction

<b>Enforcement Agency:</b>	Department of Building and Safety; Los Angeles County Fire Department
<b>Monitoring Agency:</b>	Department of Building and Safety; Los Angeles County Fire Department
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**HAZ-MM-2:** Prior to issuance of a Building Permit, the Soil Management Plan (SMP) dated May 27, 2020 and subsequent amendments shall be submitted to the Los Angeles County Fire Department for review and approval. The SMP shall be implemented during excavation and grading activities in areas of potential soil contamination to ensure site closure is properly implemented, and contaminated soil encountered is properly identified, removed, and disposed of off-site. The SMP shall include the following:

- A qualified environmental consultant shall be present as necessary during grading and excavation activities to monitor compliance with the SMP and to actively monitor the soil and excavations for evidence of contamination.
- Soil encountered during excavation or grading activities that appears to have been affected by hydrocarbons or other contamination shall be evaluated, based on appropriate laboratory analysis, by a qualified environmental consultant prior to off-site disposal at a licensed facility.
- Identified contaminated soil shall be properly removed, handled, and transported to an appropriately licensed disposal facility, in accordance with the SMP.
- Measures to protect construction workers from exposure to soils.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety; Los Angeles County Fire Department
<b>Monitoring Agency:</b>	Department of Building and Safety; Los Angeles County Fire Department
<b>Monitoring Frequency:</b>	Plan Check; Ongoing, during construction.



**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**HAZ-MM-3:** Prior to start of construction, building controls such as liquid boot protection or a passive sub-slab vapor depressurization system as part of the footprint of the structure shall be included to the satisfaction of the Los Angeles Building and Safety Department.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.

Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**HAZ-MM-4:** The design of the passive system shall include the provision to convert the passive system to an active depressurization system if vapor concentrations near the slab and in the parking structure exceed federal, state and/or local screening levels.

- Vapor sampling of the parking area and passive sub-slab system shall be conducted either annually or semi-annually to periodically measure the contaminant concentrations in those areas.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.

Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**HAZ-MM-5:** During excavation tasks, a photo-ionization detector (PID) shall be on site at all times. The PID shall be maintained in good working order and shall be calibrated by the manufacturer at least once every three months and by experienced personnel on a daily basis. The calibration of the device shall be verified using

hexane calibration gas at the beginning of each working day. In the event that inconsistent or erratic readings are experienced, or the PID becomes otherwise inoperable, all excavation activities will cease until it is repaired or replaced.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**HAZ-MM-6:** All monitoring shall be conducted by an environmental professional provided by Remdiox or other equally qualified professional, and the monitoring of soil will occur at a distance no more than 3 inches above the soil surface using the PID. Monitoring shall be initially conducted at a minimum frequency of one reading every fifteen minutes. Upon detection of VOC contamination, monitoring shall be conducted at a minimum rate of one reading for every five cubic yards excavated. All readings shall be taken no later than three minutes after each load of soil is excavated. All monitoring shall be conducted by trained personnel who are proficient in the use of the PID. Written records of PID monitoring and calibrations shall be kept in a format approved by the SCAQMD. The certification on all records shall be signed and dated on the day the measurements are observed. Upon detection of VOC-contaminated soil (defined by PID readings 50 ppmV or greater), the SCAQMD shall be notified within 24 hours. The Soil Monitoring Program is required by SCAQMD but is also designed to provide a framework for segregating the soil planned for export into three categories: Significantly Impacted Soil, Lightly Impacted Soil, and Non-Impacted Soil.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**HAZ-MM-7:** Although not expected during this project, any VOC-contaminated soil greater than 1000 ppmV shall be immediately stockpiled, covered with plastic sheeting and stored separately from non-VOC-contaminated soil. Once excavated, contaminated soil under these conditions will be considered contaminated at all times and will not be backfilled. A VOC contaminated stockpile shall not contain more than 500 cubic yards of soil.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**HAZ-MM-8:** If the PID measurement is greater than 50 ppmV, but less than 1000 ppmV, the affected work area and load of soil shall be sprayed with water to suppress vapors. The contaminated soil in stockpiles shall be covered with plastic sheeting and secured so that no portion of the contaminated soil is exposed to the atmosphere.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety

**Monitoring Agency:** Department of Building and Safety

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during construction

**Action Indicating Compliance:** Plan approval; field inspection sign-offs

**HAZ-MM-9:** If the PID measurement is greater than 1000 ppmV, SCAQMD will be notified within one hour and the affected soil and working area shall be immediately sprayed with water. Contaminated soil once stockpiled and covered with plastic sheeting shall remain covered and undisturbed until removed from the site. In the unlikely event that any contaminated soils meet the criteria for designation as hazardous waste it will be disposed of according to the applicable SCAQMD and City regulations.

**Monitoring Phase:** Pre-Construction; Construction

<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

**HAZ-MM-10:** Any soil with readings greater than 50 ppmV via PID shall be considered potentially contaminated and placed in a separate stockpile from native soil that is not impacted. This material will require additional testing and separate disposal from the (highly unlikely) Significantly Impacted Soil and the (probably more voluminous) Non-Impacted Soil. Monitoring of the spoils during excavation using the PID is the primary mechanism for separation of the material into different piles that may not be comingled. Stockpiles may be expanded to a maximum of 500 cubic yards before disposal is required. Determining the fate and destination of the stockpiled soil will require sampling and profiling of the material as required by the waste-accepting facility. This will include laboratory testing for petroleum hydrocarbons, VOC, heavy metals, and other components at their discretion. Soil that passes the field screening and has less than 50 ppmV VOC will be considered Non-Impacted by the SCAQMD Rule 1166 standards, but still may be impacted enough to warrant discretionary disposal at an appropriate landfill. Because of the high sensitivity of chlorinated volatiles, Remdiox recommends that all soils over 1 ppmV be contained in a separate pile from non-impacted soil.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety
<b>Monitoring Agency:</b>	Department of Building and Safety
<b>Monitoring Frequency:</b>	Once, at Plan Check. Ongoing, during construction
<b>Action Indicating Compliance:</b>	Plan approval; field inspection sign-offs

## **XVII. TRANSPORTATION**

### **PROJECT DESIGN FEATURES**

**TRA-PDF-1:** Reduce Parking Supply: This measure encourages alternative transportation choices. The degree of effectiveness of this measure varies based on the surrounding area, level of existing transit service, level of existing pedestrian and bicycle networks and other factors which would complement the shift away from single-occupant vehicle travel. The Project will provide 402 parking spaces (i.e., 140 spaces less than the 542 spaces required per LAMC prior to consideration of allowable adjustments).

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Frequency:</b>	Once, at Plan Check.  Ongoing, during operations
<b>Action Indicating Compliance:</b>	Plan approval

**TRA-PDF-2:** Bicycle Infrastructure: These improvements help reduce peak-hour vehicle trips by making commuting by bicycle easier and more convenient. The Project should provide a maximum commitment to implementing/improving on-street bicycle facilities, providing bicycle parking per the LAMC and providing secure ancillary bike facilities such as indoor bicycle parking/lockers, showers, and repair stations. The Project will provide the minimum number of short-term and long-term bicycle parking spaces for the residential and commercial components.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Frequency:</b>	Once, at Plan Check.  Ongoing, during operations
<b>Action Indicating Compliance:</b>	Plan approval

**TRA-PDF-3:** Neighborhood Enhancement: Providing a pedestrian access network to link areas of the Project site encourages people to walk instead of drive. The project should ensure a maximum commitment to providing pedestrian network improvements within the project and to off-site connections. The Project will include pedestrian access points directly to sidewalks on the adjacent streets. Specifically, a walk-in entrance to the Project's residential component is proposed via Bay Street. Additionally, a walk-in entrance to the Project's office and restaurant components is proposed via Mateo Street. Pedestrian access to the ground floor retail uses is proposed via adjacent streets. The Project will improve existing sidewalks or construct new sidewalks on Bay Street, Mateo Street and Sacramento Street adjacent to the site.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Frequency:</b>	Once, at Plan Check.  Ongoing, during operations
<b>Action Indicating Compliance:</b>	Plan approval

## MITIGATION MEASURES

**TRA-MM-1:** Unbundle Parking: Unbundling parking costs from property costs would require those who wish to purchase parking spaces to do so at an additional cost from the property cost. This removes the burden from those who do not wish to utilize a parking space. An assumption is made that the parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces. The Project shall charge a minimum of \$110 per month per parking space, separately from the monthly cost to rent the unit.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during operations

**Action Indicating Compliance:** Plan approval

**TRA-MM-2:** Transit Subsidy: The availability of a subsidy provides a strong incentive to consider other commute trip alternatives. The Project shall provide a subsidy commensurate to the current daily rate and accessible to 100% of eligible residents. The Project shall offer a minimum of \$0.75 per day to eligible employees and residents of the Project. Eligibility shall be determined based on the employee or resident not parking a vehicle on-site.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety; Los Angeles  
Department of Transportation

**Monitoring Agency:** Department of Building and Safety; Los Angeles  
Department of Transportation

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during operations

**Action Indicating Compliance:** Plan approval

**TRA-MM-3:** Voluntary Travel Behavior Change Program: This strategy involves the development of a travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The Project shall assign staff to serve as the transportation management coordinator to inform Project residents and employees of available travel options.

**Monitoring Phase:** Pre-Construction; Construction

**Enforcement Agency:** Department of Building and Safety; Los Angeles  
Department of Transportation

**Monitoring Agency:** Department of Building and Safety; Los Angeles  
Department of Transportation

**Monitoring Frequency:** Once, at Plan Check.  
Ongoing, during operations

**Action Indicating Compliance:** Plan approval

## **CORRECTIVE MEASURES**

### **TRA-CM-1: Transportation Demand Management (TDM) Plan**

A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The preliminary plan will include, at a minimum, measures consistent with the City's Trip Reduction Ordinance. As recommended by the transportation study, the TDM program could include, but is not limited to the following:

- An on-site Transportation Information Center (TIC) where employees, visitors, and residents can obtain information regarding public transit, ridesharing, vanpool providers, bicycle facilities, and bicycle safety;
- A Transportation Coordinator responsible for implementing, maintaining, and monitoring the TDM program;
- If after coordination with LADOT it is determined that the project site is eligible, the project will provide space for an Integrated Mobility Hub with a bicycle share kiosk and/or parking spaces for car-share vehicles;
- Carpool/Rideshare Matching Program which would provide rideshare matching services and preferential parking for commercial employees commuting to work in employer-registered carpools;
- Transportation subsidy which would offer discount transit passes to residents and commercial employees who do not purchase monthly automobile parking in the project site;
- Unbundled parking from the commercial leasing cost and from the housing cost;
- Convenient and secure bicycle storage within a bicycle locker, an attended cage, or a secure parking room;
- On-site lockers for employees who bicycle or use another active means of getting to work;
- Make a one-time fixed-fee contribution of \$50,000 prior to the issuance of the first certificate of occupancy for the project to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the proposed project area;
- A Covenant and Agreement to ensure that the TDM program will be maintained.

**Monitoring Phase:** Pre-Construction; Construction



<b>Enforcement Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Frequency:</b>	Once, at Plan Check.  Ongoing, during operations
<b>Action Indicating Compliance:</b>	Plan approval

#### **TRA-CM-2: Transportation Management Organization (TMO)**

**Transportation Management Organization (TMO)** In order to help alleviate current and future traffic congestion in the Arts District, the project proposes to fund a TMO. If an Arts District TMO will be established, the project proposes to fund the initiation of an Arts District TMO. Otherwise, if it is determined that FASTLinkDTLA can adequately serve the Arts District as well as the remainder of Downtown Los Angeles, the project proposes to fund the Arts District portion of the FASTLinkDTLA. The project agrees to the following:

- Commit funding up to \$200,000 prior to the issuance of the first certificate of occupancy for the project to cover the launch of the Arts District TMO or the Arts District portion of FASTLinkDTLA;
- Provide up to \$25,000 per year for nine additional years for annual dues as a charter member;
- Attend organizational meetings and provide traffic demand data to the TMO;
- Require commercial space tenants of all leases executed by the project as a landlord to participate in the TMO and that all subleases contain this same provision;
- Elect to provide some or all of the services required by this TDM Program through the TMO, in consultation with the City's Transportation Demand Program.

<b>Monitoring Phase:</b>	Pre-Construction; Construction
<b>Enforcement Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	Department of Building and Safety; Los Angeles Department of Transportation
<b>Monitoring Frequency:</b>	Once, at Plan Check.

Ongoing, during operations

**Action Indicating Compliance:** Plan approval**TRA-CM-3: Traffic Monitoring Plan for the TDM Program**

In order to assess the project's actual trip generation and any subsequent TDM Plan (if deemed necessary), a traffic monitoring plan will be implemented once the project is built and occupied to at least 80%. A traffic monitoring plan will consist of counting the number of automobiles coming from and going to the two project driveways during both AM and PM peak hours.

The monitoring program should be conducted annually to ensure compliance for a period of three years. If the project is found to not confirm to the trip reduction targets summarized in Attachment 4 of the LADOT Approval Letter, the project will have an additional year to meet the trip reduction levels. If the project continues to not meet the TDM goals, the City and project staff will coordinate on implementing further TDM strategies. The final traffic monitoring plan and TDM Plan will be prepared for and approved by the LADOT prior to the issuance of the first certificate of occupancy for the project.

**Monitoring Phase:** Pre-Construction; Construction**Enforcement Agency:** Department of Building and Safety; Los Angeles  
Department of Transportation**Monitoring Agency:** Department of Building and Safety; Los Angeles  
Department of Transportation**Monitoring Frequency:** Once, at Plan Check.

Ongoing, during operations

**Action Indicating Compliance:** Plan approval

