

## Chapter IV

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# 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 CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program. An EIR has been prepared to address the Project’s potential environmental impacts. The evaluation of the Project’s impacts takes into consideration project design features (PDFs), which are measures that are a component of the Project’s design and are detailed in the EIR. Where appropriate and feasible, the EIR also identifies mitigation measures to avoid or substantially lessen significant and unavoidable impacts. This MMP is designed to monitor implementation of the PDFs and mitigation measures.

Section 5, below, provides a complete MMP for the Project as studied in the Draft EIR and corrected and modified in Chapter III, *Revisions, Clarifications, and Corrections*, of this Final EIR. As stated previously in the Final EIR, in a letter dated February 5, 2021, MSMU has requested that the Department of City Planning consider the recommendation of Alternative 5.

Alternative 5 would reduce the Project’s significant and unavoidable operational traffic impacts identified in the Draft EIR to a level of less than significant and would incrementally reduce the Project’s significant and unavoidable off-site construction noise impacts. As explained in Chapter III, *Revisions, Clarifications, and Corrections*, and shown in Table III-15, *Comparison of Impacts Summary*, Alternative 5 would reduce the Project’s environmental impacts over a broad range of environmental issues in the categories of Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse

Gas Emissions, Hydrology and Water Quality, Noise and Vibration, Public Services, Transportation and Traffic, Tribal Cultural Resources, and Utilities.

With respect to its PDFs and Mitigation Measures, Alternative 5 is consistent with the Project in every category apart from Transportation and Traffic, and would, if approved by the Lead Agency, incorporate the Project's MMP as provided in Section 6, below, other than with respect to Transportation and Traffic. Section 6, below, provides mitigation and monitoring program elements specific to Alternative 5's Transportation and Traffic PDFs and MMs.

Therefore, any reference to the "Project" (or project) below shall apply to both the Project and Alternative 5, unless otherwise noted.

## 2. Purpose

It is the intent of the MMP to:

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

## 3. Organization

As shown on the following pages, each required project design feature and mitigation measure for the Project is listed and categorized by impact area, with an accompanying identification of the following:

- **Enforcement Agency:** The agency with the power to enforce the project design feature or mitigation measure;
- **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 project design feature or mitigation measure shall be monitored;
- **Monitoring Frequency:** The frequency at which the project design feature or mitigation measure shall be monitored; and
- **Action Indicating Compliance:** The action(s) of which the Enforcement or Monitoring Agency indicates that compliance with the required project design feature or mitigation measure has been implemented.

## 4. Administrative Procedures and Enforcement

This MMP shall be enforced throughout all phases of the Project. MSMU shall be responsible for implementing each PDF and mitigation measure 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. MSMU shall maintain records demonstrating compliance with each PDF and mitigation measure. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, MSMU 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 mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of MSMU's compliance with the PDFs and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by MSMU and Construction Monitor and be included as part of MSMU's Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if MSMU does not correct the non-compliance within a reasonable time of notification to MSMU by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

## 5. Program Modification

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and mitigation measures contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or mitigation measure 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 mitigation measures. Any addendum or

subsequent CEQA clearance shall explain why the PDF or mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or mitigation measure, 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 mitigation measure 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 mitigation measure results in a substantial change to the Project or the non-environmental conditions of approval.

## 6. Draft EIR Project – Mitigation Monitoring Program

### a) Aesthetics

#### (1) Project Design Features

**PDF-AES-1:** Outdoor lighting, including walkway security lighting, plaza lighting, and lighting for the parking areas, shall be designed and installed with shielding, such that the light source cannot be seen from residential properties in the area, or the off-site public right-of-way.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction; Pre-operation
<b>Monitoring Frequency:</b>	Periodic field inspections during construction; once at Project plan check; once during field inspection
<b>Action Indicating Compliance:</b>	Plan check approval and issuance of applicable building permit; compliance certification report by Project contractor; field inspection sign-off; issuance of Certificate of Occupancy

**PDF-AES-2:** Glass used in building facades shall minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted. Prior to issuance of a building permit, the City of Los Angeles Department of Building and Safety (LADBS) shall review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials, and would not cause significant glare impacts on motorists or nearby residential uses.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
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<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction; Pre-operation
<b>Monitoring Frequency:</b>	Once at Project plan check; Once during field inspection
<b>Action Indicating Compliance:</b>	Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

## b) Air Quality

### (1) Project Design Features

**PDF AQ-1:** The Project shall comply with applicable CalGreen requirements regarding the number of EV Ready and EV Capable parking spaces. Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. When the application of the CalGreen requirement results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction; Pre-operation
<b>Monitoring Frequency:</b>	Once at Project plan check; once during field inspection
<b>Action Indicating Compliance:</b>	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**PDF AQ-2:** Natural light would be incorporated in the design of the main building spaces using large expanses of glass and skylights.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction; Pre-operation

**Monitoring Frequency:** Once at Project plan check; once during field inspection

**Action Indicating Compliance:** Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**PDF AQ-3:** Installation of an interior light system that would be able to sense the amount of natural light available and automatically adjust the amount of artificial light needed.

**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 approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**PDF AQ-4:** High efficiency, low-e insulated glass units would be used for the Project.

**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 approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

**PDF AQ-5:** The Project roof would be single-ply to reflect solar heat and reduce heat absorption into the building.

**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 approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**PDF AQ-6:** Water bottle filling stations would be provided in the proposed Wellness Pavilion, reducing waste from disposal of water bottles.

**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 Plan Check, periodic inspections during occupancy  
**Action Indicating Compliance:** Issuance of Certificate of Occupancy

**PDF AQ-7:** A minimum of 15 percent of the roof area would be solar ready.

**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 approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

**PDF AQ-8:** Where electricity from power poles is readily available, such electricity from power poles shall be used to power construction equipment during Project construction and/or solar power generators rather than temporary diesel- or gasoline-powered generators. In the event that electricity from power poles is not readily available during construction, solar-powered generators shall be used to power construction equipment during Project construction rather than temporary diesel or gasoline-powered generators. If electricity is not available from power poles or cannot be feasibly provided by solar-powered generators, then temporary diesel or gasoline-powered generators may be used to power construction equipment during Project construction.

**Enforcement Agency:** City of Los Angeles Department of Building and Safety  
**Monitoring Agency:** City of Los Angeles Department of Building and Safety  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic field inspections during construction  
**Action Indicating Compliance:** Field inspection sign-off; Compliance report by Project contractor

## (2) Mitigation Measures

**MM AQ-1:** Mobile off-road construction equipment (wheeled and tracked) used during construction of the Project shall meet or exceed the Interim USEPA Tier 4 standards. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. The mitigation applies to off-road equipment and does not apply to on-road vehicles.

<b>Enforcement Agency:</b>	South Coast Air Quality Management District
<b>Monitoring Agency:</b>	City of Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction; Construction
<b>Monitoring Frequency:</b>	Periodic field inspections during construction
<b>Action Indicating Compliance:</b>	Field inspection sign-off; compliance report by Project contractor

## c) Biological Resources

### (1) Project Design Features

**PDF BIO-1:** Prior to issuance of a grading permit, the Project Applicant shall coordinate with the City and replace any non-protected significant trees that are 8 inches or more in diameter at breast height (DBH), or cumulative trunk diameter if multi-trunked, that were removed during the Project construction period, at a 1:1 ratio with a minimum 24-inch box tree. Replacement trees should be planted on-site; however, if there is insufficient space, replacement trees can also be planted elsewhere on the Mount St. Mary's University Chalon Campus.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction; Construction
<b>Monitoring Frequency:</b>	Once prior to Certificate of Occupancy
<b>Action Indicating Compliance:</b>	Field inspection sign-off; compliance report by Project contractor

### (2) Mitigation Measures

**MM BIO-1:** Prior to issuance of a grading permit, the Project Applicant shall demonstrate that the following requirements have been included in the Project construction plan:

1. Nesting activity typically occurs from February 15 to August 31 (January 15 to August 31 for raptors). Vegetation removal activities shall 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. This includes vegetation removal associated with on-going fuel modification activities.

2. Any construction activities or fuel modification activities that occur during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) shall require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist monitor (i.e., professional biologist with a minimum of two years of avian survey experience or equivalent) before commencement of clearing. If any active nests are detected, a buffer of at least 300 feet (500 feet for raptors), or as determined appropriate by the qualified biologist monitor, shall be delineated, flagged, and avoided until the nesting cycle is complete as determined by the qualified biologist monitor.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	City of Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction
<b>Monitoring Frequency:</b>	Once, prior to issuing a Building Permit, periodic field inspections during construction
<b>Action Indicating Compliance:</b>	Field inspection sign-off; compliance report by qualified consultant

**MM BIO-2:** For preserved trees (e.g., trees to be avoided or that may potentially be encroached upon), the following protection measures shall be implemented during the construction of the Project:

Protective Fencing:

- Protective fencing not less than four feet in height shall be placed at the limits of the protective zone of a preserved tree located within 50 feet of the grading limits. Protective fencing shall be inspected by a qualified biologist prior to grading or ground disturbing activities, and shall be maintained in place until construction is completed.
- Fencing shall remain intact until a Tree Expert (as defined in LAMC Section 17.02) and/or the City's arborist verifies that it can be removed.

Grading Restrictions Near Trees:

- The grade shall not be lowered or raised within the protective zone of a preserved tree without the approval from the City's Department of Urban Forestry. A Tree Expert (as defined in LAMC Section 17.02) shall supervise all excavation or grading approved within the protective zone.

Trenching and Excavation:

- Trenching, excavation, or clearance of vegetation within the protective zone of a preserved tree shall be accomplished by the use of hand tools or small hand-held power tools, and shall be monitored by a Tree Expert (as defined in Section 17.02). If major roots are encountered during grading activities (including trenching, excavation, and other related ground disturbance activities), a qualified arborist (i.e., ISA certified arborist) shall be notified to provide recommendations for pruning or avoidance measures. Any major roots encountered shall be conserved and treated as recommended by the Tree Expert (as defined in LAMC Section 17.02).
- Utility trenches shall be routed outside the protective zone of a preserved tree as determined by the City's Department of Urban Forestry.

Equipment Storage:

- No storage of equipment, supplies, vehicles, or debris shall be allowed within the protective zone of a preserved tree to avoid soil compaction.
- No dumping of construction wastewater, paint, stucco, concrete, or any other clean-up waste shall occur within the protective zone of a preserved tree.
- No temporary structures shall be placed within the protective zone of any preserved trees.

Frequency of Watering Around Oak Trees:

- Irrigation water shall not reach within 15 feet of any oak trunk.
- Neither grass nor any other ground cover shall be planted under the canopy of oak trees.

Pruning:

- Pruning of preserved trees shall comply with the National Arborist Association guidelines; in no case shall more than 20 percent of a preserved tree canopy be removed. As determined to be necessary by a certified arborist, after pruning, installation of support cables to prevent future main crotch failures are required.
- Branches that could be injured by vehicles or that interfere with construction shall be pruned to the satisfaction of a certified arborist.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction

**Monitoring Frequency:** Once, prior to issuing a Building Permit, periodic field inspections during construction

**Action Indicating Compliance:** Field inspection sign-off; compliance report by qualified consultant/certified arborist

**MM BIO-3:** A Tree Expert (as defined in LAMC Section 17.02) shall be present for on-site construction and grading activities occurring within 10 feet of the protected zone of all preserved trees. If any major roots larger than 1 inch in diameter are encountered during construction activities, the qualified arborist (i.e., ISA certified arborist) shall be notified to provide recommendations to avoid damaging roots, so that the health of the tree will not be compromised.

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

**Monitoring Phase:** Construction

**Monitoring Frequency:** Periodic during construction per recommendations of consultant

**Action Indicating Compliance:** Field inspection sign-off; compliance report by qualified consultant

**MM BIO-4:** Post-Construction Monitoring and Reporting - 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 preserved trees that have been encroached upon by the Project. The condition of the trees shall be compared with the data provided in this report to determine if the Project may have had a negative effect on the health or physical structure of the tree. A monitoring report shall be prepared by a Tree Expert (as defined in LAMC Section 17.02) and submitted to the City's Urban Forester within one-month following the completion of the post-construction monitoring. If any of the preserved trees die within three years as a consequence of construction, they shall also be replaced at a 1:1 replacement ratio for non-protected trees and a 2:1 replacement ratio for protected trees.

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

**Monitoring Phase:** Post-construction

**Monitoring Frequency:** Once, three years subsequent to completion of construction

**Action Indicating Compliance:** Field inspection sign-off; compliance report by qualified consultant

## d) Cultural Resources

### (1) Mitigation Measures

**MM APR-1:** In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed during ground-disturbing activities associated with construction of the Project, the Applicant shall halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated by a Qualified Archaeologist. A Qualified Archaeologist is an individual who meets the Secretary of the Interior’s Professional Qualifications Standards for an Archaeologist. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a Qualified Archaeologist. If a resource is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes. The Qualified Archaeologist, in consultation with the City and Applicant, shall determine the need for archaeological construction monitoring in the vicinity of the find thereafter.

The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of treatment and/or the any follow-up archaeological construction monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies.

**Enforcement Agency:** City of Los Angeles Department of City Planning

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

**Monitoring Phase:** Construction  
**Monitoring Frequency:** Periodic per recommendations of archeologist  
**Action Indicating Compliance:** Compliance report by qualified archaeologist

## e) Geology and Soils

### (1) Project Design Features

**PDF-GS-1:** A qualified geotechnical engineer (e.g., a Certified Engineering Geologist or a Geotechnical Engineer as licensed by the State of California Board for Professional Engineers, Land Surveyors, and Geologists) shall be retained by the Applicant and be present on the Project Site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in the Final Geotechnical Report, map geologic conditions during grading, and test all grading and earthwork.

**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:** Compliance certificate report by qualified consultant

## f) Hydrology and Water Quality

### (1) Project Design Features

**PDF-H/WQ-1:** An underground stormwater drain system shall be installed along the edges of the Project Site to collect and divert any uncontrolled sheet flow that would enter the Campus's east- and west-facing natural slopes.

**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:** Periodic field inspections during construction; once at Project plan check; once during field inspection  
**Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; compliance certification report by Project contractor; field inspection sign-off; issuance of Certificate of Occupancy

## g) Noise

### (1) Mitigation Measures

**MM-NOISE-1:** On-site power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices achieving a 10 dBA noise level reduction from standard equipment noise emissions. All equipment shall be properly maintained in compliance with manufacturers' standards.

**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;  
City of Los Angeles Department of City Planning

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

**Monitoring Frequency:** Periodic field inspections

**Action Indicating Compliance:** Compliance certificate report by qualified consultant

**MM-NOISE-2:** All on-road heavy-duty construction vehicles used during the demolition, concrete pouring, and asphalt paving phases of construction shall be equipped with properly operating and maintained noise mufflers that achieve a minimum 10 dBA noise level reduction, based on the manufacturer's specifications for noise reduction performance.

**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:** Ongoing during construction

**Action Indicating Compliance:** Compliance certificate report by qualified consultant

## h) Transportation and Traffic

### (1) Project Design Features

**PDF-TRAF-1:** Construction Traffic Management Plan. MSMU shall prepare a detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans as necessary and satisfactory to LADOT. The Construction Traffic Management Plan shall be based on the nature and timing of the specific

construction activities and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

- Appropriate temporary traffic controls (signs and temporary signals) shall be installed along the public rights-of-way during all construction activities to ensure pedestrian and vehicular safety during construction.
- Scheduling construction activities to reduce the effect on traffic flow on arterial streets. During peak haul traffic, if off-site staging is required, trucks would be radioed in from an off-site staging area to avoiding queuing along adjacent street.
- Schedule construction-related deliveries, other than concrete and earthwork-related deliveries, between the hours of 7:00 AM and 3:00 PM to avoid the PM Peak hour as identified in the Project's Traffic Study and to reduce the potential of trucks waiting to load or unload for protracted periods of time. This restriction shall not apply to trucks being used for the concrete pour that cannot feasibly be finished before 3:00 PM.
- Maintain access for surrounding residential uses in proximity to the Project Site during Project construction.
- Identify designated transport routes for haul trucks and heavy trucks to be used over the duration of the Project. Develop a plan for staging trucks prior to arriving at the Site.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring residences at all times.
- In the event of temporary lane closures, a worksite traffic control plan, approved by LADOT, should be implemented to route vehicular traffic or pedestrians around any such closures.
- Unrestricted access for school buses shall be maintained on street rights-of-way during construction.
- Project contractors shall maintain ongoing communication with school administrators at affected schools along the haul route including Archer School for Girls, Brentwood School, and St Martin of Tours School, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Barriers and/or fencing shall be installed around construction sites to secure construction equipment and the Site and to prevent trespassing, vandalism, and attracting nuisances.
- Temporary haul truck staging will not be permitted on local hillside streets.
- Truck loading/unloading will occur on the MSMU Campus, not on local hillside streets.
- Safe truck driving practices, including low gear, not passing another vehicle, deployment of optional 4th axle, if available, shall be required.

- During construction, MSMU shall clearly post a hotline in several areas around the Campus, including along the construction fence and at the entrance to the Campus, to enable the public to call and report non-compliance with the Construction Traffic Management Plan.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
<b>Monitoring Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Pre-construction; Construction
<b>Monitoring Frequency:</b>	Once prior to issuance of Building Permit; Periodic field inspections during construction
<b>Action Indicating Compliance:</b>	Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**PDF-TRAF-2:** Construction Parking Plan. MSMU shall prepare a Construction Parking Plan prior to the issuance of a building permit that identifies temporary parking locations for construction workers and for MSMU students, faculty/staff, and visitors and shall include the following elements as appropriate:

- Parking for MSMU students, faculty/staff, and visitors shall be accommodated via a valet service on the Campus. Valet operations would enable vehicles to be stacked in on-site parking lot aisles to maximize available vehicle parking spaces on the Campus.
- No construction worker parking will be allowed on local residential streets. Construction workers shall all park on the Campus.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. All contracts with construction contractors shall expressly prohibit construction worker parking on residential streets. The contractor shall be responsible for informing subcontractors and construction workers of this requirement, for monitoring compliance of the subcontractors, and if necessary, for hiring a security guard to enforce these parking provisions.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
<b>Monitoring Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Pre-construction; Construction

**Monitoring Frequency:** Once prior to issuance of Building Permit; Periodic field inspections during construction

**Action Indicating Compliance:** Approval of Construction Parking Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**PDF-TRAF-3:** The Project Applicant shall attend bi-monthly (or at a frequency determined appropriate by City Staff) construction management meetings conducted by City Staff and the operators or contractors for the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. Coordination shall ensure that construction activities associated with these concurrent related projects and hauling activities are managed in collaboration with one another. The Project Applicant shall provide advance notification to LADOT, the Archer School for Girls, and the Brentwood School of its upcoming construction activities, including durations and daily hours of construction.

**Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning

**Monitoring Agency:** City of Los Angeles Department of Transportation

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

**Monitoring Frequency:** Once prior to issuance of Building Permit; Periodic during construction

**Action Indicating Compliance:** Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit and City of Los Angeles Department of City Planning (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**PDF-TRAF 4:** The Project Applicant shall develop a plan for coordinating access for construction workers, school employees, students, and bus access when school and construction are concurrent.

**Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning

**Monitoring Agency:** City of Los Angeles Department of Transportation

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

**Monitoring Frequency:** Once prior to issuance of Building Permit; Periodic field inspections during construction

**Action Indicating Compliance:** Approval of Construction Management Plan from the City of Los Angeles Department of Transportation and City of Los Angeles Department of City Planning prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**PDF-TRAF-5:** Construction truck travel on local streets shall be limited to Bundy Drive, Norman Place, and Chalon Drive only; trucks would not travel on any other local streets serving the neighborhoods surrounding the Project Site.

**Enforcement Agency:** City of Los Angeles Department of Transportation

**Monitoring Agency:** City of Los Angeles Department of Transportation

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

**Monitoring Frequency:** Once prior to issuance of Building Permit; Periodic field inspections during construction

**Action Indicating Compliance:** Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**PDF-TRAF-6:** All heavy truck hauling of construction equipment and construction materials deliveries shall be limited to hours between 7:00 AM and 3:00 PM to avoid the PM peak-hour commuter traffic period. This restriction shall not apply to concrete pour that cannot feasibly be finished prior to 3:00 PM. No on-street staging or idling of haul trucks on public roadways will be allowed.

**Enforcement Agency:** City of Los Angeles Department of Transportation

**Monitoring Agency:** City of Los Angeles Department of Transportation

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

**Monitoring Frequency:** Once prior to issuance of Building Permit; Periodic field inspections during construction

**Action Indicating Compliance:** Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**PDF-TRAF-7:** Campus Event Coordination Plan. MSMU shall develop a Campus Event Coordination Plan that would define the parameters of the valet parking program, monitor off-Campus parking during events, and provide staff/signage to direct traffic during

events. This Plan shall be submitted to LADOT for review and approval prior to issuance of a certificate of occupancy for the proposed Wellness Pavilion.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Operation
<b>Monitoring Frequency:</b>	Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation
<b>Action Indicating Compliance:</b>	Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

**PDF-TRAF-8** – MSMU will limit the total number of outside guests to 400 on a daily basis for new events such as the Other Wellness/Sports Events and Health and Wellness Speaker Series, and 200 campers and 40 staff on a daily basis for Summer Sports Camps. No new Wellness Pavilion event may occur concurrently with any existing event.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Operation
<b>Monitoring Frequency:</b>	Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation
<b>Action Indicating Compliance:</b>	Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

## (2) Mitigation Measures

**MM-TRAF-1:** During construction, in each individual hour within the PM peak period (4 PM to 6 PM), allow a maximum of 37 outbound PCE vehicle trips and 6 inbound PCE vehicle trips.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Periodic field inspections during construction

**Action Indicating Compliance:** Compliance certification report submitted by Project contractor

## 7. Alternative 5 – Mitigation Monitoring Program

As mentioned above, Alternative 5's Mitigation Monitoring Program will be consistent with the Project's apart from the Transportation and Traffic section. Alternative 5's Transportation and Traffic mitigation and monitoring program follows below. As discussed in Chapter III, *Revisions, Clarifications, and Corrections*, Alternative 5 incorporates modified versions of the Project's PDF-TRAF-1, PDF-TRAF-2, and PDF-TRAF-7 that incorporate all of the substantive provisions of the Project's PDF-TRAF-3, PDF-TRAF-4, PDF-TRAF-5, and PDF-TRAF-6.

Additionally, as PDF-TRAF-8 provided for a daily outside guest limit applicable to Other Wellness/Sports Activities, Health and Wellness Speaker Series, and Summer Camps, implementation of Alternative 5 would restrict vehicle trips in place of establishing a maximum number of daily outside guests. PDF-TRAF-8 would no longer establish a meaningful threshold given Alternative 5's use of a different metric (restriction of vehicle trips in place of a maximum outside guest attendance) to ensure that operational traffic impacts would be less than significant, and is therefore not included under Alternative 5.

Alternative 5 also incorporates new traffic PDFs PDF-TRAF-9 through PDF-TRAF-18. Therefore, the complete list of Alternative 5's traffic PDFs is as follows:

- PDF-TRAF-1
- PDF-TRAF-2
- PDF-TRAF-7
- PDF-TRAF-9
- PDF-TRAF-10
- PDF-TRAF-11
- PDF-TRAF-12
- PDF-TRAF-13
- PDF-TRAF-14
- PDF-TRAF-15
- PDF-TRAF-16
- PDF-TRAF-17
- PDF-TRAF-18

## a) Transportation and Traffic

### (1) Project Design Features

**PDF-TRAF-1:** Construction Traffic Management Plan. MSMU shall prepare a detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans as necessary and satisfactory to LADOT. The Construction Traffic Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

- Appropriate temporary traffic controls (signs and temporary signals) shall be installed along the public rights-of-way during all construction activities to ensure pedestrian and vehicular safety during construction.
- During peak haul traffic, if off-site staging is required, trucks would be radioed in from an off-site staging area to avoid queuing along adjacent street.
- Schedule construction-related deliveries, other than concrete and earthwork-related deliveries, between the hours of 7:00 AM and 3:00 PM to avoid the PM peak hour commuter traffic period as identified in the Project's Traffic Study and to reduce the potential of trucks waiting to load or unload for protracted periods of time. This restriction shall not apply to trucks being used for the concrete pour that cannot feasibly be finished before 3:00 PM. No on-street staging or idling of haul trucks on public roadways will be allowed.
- Maintain access for surrounding residential uses in proximity to the Project Site during Project construction.
- Identify designated transport routes for haul trucks and heavy trucks to be used over the duration of the Project. Develop a plan for staging trucks prior to arriving at the Site. Temporary haul truck staging will not be permitted on local hillside streets.
- Truck loading/unloading will occur on the MSMU Campus, not on local hillside streets.
- Construction truck travel on local streets shall be limited to Bundy Drive, Norman Place, and Chalon Drive only; trucks would not travel on any other local streets serving the neighborhoods surrounding the Project Site.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring residences at all times.
- In the event of temporary lane closures, a worksite traffic control plan, approved by LADOT, should be implemented to route vehicular traffic or pedestrians around any such closures.
- Unrestricted access for school buses shall be maintained on street rights-of-way during construction.

- MSMU shall attend bi-monthly (or at a frequency determined appropriate by City Staff) construction management meetings conducted by City Staff and the operators or contractors for the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. Coordination shall ensure that construction activities associated with these concurrent related projects and hauling activities are managed in collaboration with one another.
- MSMU shall provide advance notification to LADOT, the Archer School for Girls, the Brentwood School, and St. Martin of Tours School of its upcoming construction activities, including durations and daily hours of construction, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Barriers and/or fencing shall be installed around construction sites to secure construction equipment and the Site and to prevent trespassing, vandalism, and attracting nuisances.
- Safe truck driving practices, including low gear, not passing another vehicle, deployment of optional 4th axle, if available, shall be required.
- During construction, MSMU shall clearly post a hotline in several areas around the Campus, including along the construction fence and at the entrance to the Campus, to enable the public to call and report non-compliance with the Construction Traffic Management Plan.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Pre-construction; Construction
<b>Monitoring Frequency:</b>	Once prior to issuance of Building Permit; Periodic field inspections during construction
<b>Action Indicating Compliance:</b>	Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**PDF-TRAF-2:** Construction Parking Plan. MSMU shall prepare a Construction Parking Plan prior to the issuance of a building permit that identifies temporary parking locations for MSMU students, faculty/staff, and visitors and shall include the following elements as appropriate:

- Parking for MSMU students, faculty/staff, and visitors shall be accommodated via a valet service on the Campus. Valet operations would enable vehicles to be stacked in on-site parking lot aisles to maximize available vehicle parking spaces on the Campus.

- No construction worker parking will be allowed on local residential streets. Construction workers shall all park on the Campus.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. All contracts with construction contractors shall expressly prohibit construction worker parking on residential streets. The contractor shall be responsible for informing subcontractors and construction workers of this requirement, for monitoring compliance of the subcontractors, and if necessary, for hiring a security guard to enforce these parking provisions.
- MSMU shall develop a plan for coordinating access for construction workers, school employees, students, and bus access when school and construction are concurrent.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Pre-construction; Construction
<b>Monitoring Frequency:</b>	Once prior to issuance of Building Permit; Periodic field inspections during construction
<b>Action Indicating Compliance:</b>	Approval of Construction Parking Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

**PDF-TRAF-7:** MSMU shall develop a Campus Event Coordination Plan that would define the parameters of the parking reservation system, shuttling, valet parking program, monitoring of on-Campus parking and parking at designated off-Campus parking locations during Other Wellness/Sports Activities events, Health and Wellness Speaker Series events, Summer Sports Camps with up to 50 campers, and Club Sports activities, and-provision of staff/signage to direct vehicles during such events. This Plan shall be submitted to LADOT for review and approval prior to issuance of a certificate of occupancy for the proposed Wellness Pavilion. The Campus Event Coordination Plan shall implement the minimum performance standards set forth in PDF-TRAF-9 to PDF-TRAF-18.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Prior to Operation; Operation

**Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation

**Action Indicating Compliance:** Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

**PDF-TRAF-9:** MSMU shall maintain on its website a publicly accessible calendar, updated at least once per month, identifying all Campus events with over fifty outside guests.

**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 inspections during operation

**Action Indicating Compliance:** Compliance certification report submitted by MSMU

**PDF-TRAF-10:** MSMU shall institute a parking reservation/ticketing system for outside guests arriving to Campus in non-shuttle vehicles for any Other Wellness/Sports Activities or Health and Wellness Speaker Series event, Summer Sports Camps with up to 50 campers, and for Club Sports activities.

- All outside guests shall be required to use the parking reservation/ticketing system, which shall clearly and conspicuously inform all outside guests that entrance to the Campus will only be permitted under the circumstances provided for by that outside guest's ticket (i.e. a parking reservation or shuttle).
- The reservation system shall include a reporting capability such that logs detailing issued reservations can be generated and reviewed. LADOT may audit the parking reservation system at any time.
- For regularly occurring events, such as Summer Sports Camps, entry to the Campus by outside guests will require permits issued through the parking reservation system.
- Outside guests and Summer Camp attendees will be required to identify at the time they register in the parking reservation/ticketing system whether they will be traveling in a private vehicle or via transportation network companies (TNCs) (such as Uber or Lyft) and their permit will specify their selected mode. Outside guests or Summer Camp attendees arriving by either private or TNC vehicles that do not have either a private vehicle or TNC permit, respectively, will not be allowed to enter the Campus.
- A reservation for a private vehicle or a Summer Sports Camp staff vehicle will count as two trips. A reservation for a TNC vehicle or private vehicle for outside guests or dropping off/picking up Summer Camp attendees will count as two trips for each arrival to or departure from Campus.

No additional parking reservations/tickets shall be issued once the maximum permitted attendance or trip cap limits are reached.

Accordingly, for outside guests to be granted access to the Campus for Other Wellness/Sports Activities, Health and Wellness Speaker Series events, Summer Sports Camps, or Club Sports activities they must either:

- (1) Arrive by shuttle;
- (2) Be Summer Sports Camp campers with parking permits; or
- (3) Be event outside guests with reservations issued through the parking reservation system.

Outside guests for Other Wellness/Sports Activities, Health and Wellness Speaker Series events, Summer Sports Camps, or Club Sports activities seeking entrance to the Campus in non-shuttle vehicles without a reservation or a permit will be denied access to the Campus. Pedestrian access shall be restricted in accordance with PDF-TRAF-17.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Operation
<b>Monitoring Frequency:</b>	Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation
<b>Action Indicating Compliance:</b>	Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

**PDF-TRAF-11:** No Other Wellness/Sports Activities or Health and Wellness Speaker Series events shall be scheduled with start times between 7:00 to 9:30 AM and 4:00 to 7:30 PM or end times between 6:30 to 9:00 AM and 3:30 to 7:00 PM.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Operation
<b>Monitoring Frequency:</b>	Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation

**Action Indicating Compliance:** Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by Project Applicant

**PDF-TRAF-12:** Total daily outside guest vehicle trips to/from Other Wellness/Sports Activities, Health and Wellness Speaker Series events, and Club Sports activities will be limited to 310 outside guest vehicle trips (155 inbound and 155 outbound), which will be applicable to all vehicles, including shuttles. Pedestrian access shall be restricted in accordance with PDF-TRAF-17.

**Enforcement Agency:** City of Los Angeles Department of Transportation

**Monitoring Agency:** City of Los Angeles Department of Transportation

**Monitoring Phase:** Operation

**Monitoring Frequency:** Periodic field inspections during operation

**Action Indicating Compliance:** Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by Project Applicant

**PDF-TRAF-13:** MSMU shall require that campers attending Summer Sports Camps with more than 50 campers travel via shuttles and/or carpools. The number of allowable trips for each peak period would be restricted to 71 inbound and 31 outbound trips during any single hour within the weekday 7:00-9:00 AM peak period, 8 inbound and 34 outbound trips during the weekday 3:00-4:00 PM peak hour, and 3 inbound and 8 outbound trips during any single hour within the weekday 4:00-6:00 PM peak period. If MSMU permits Summer Sports Camps to begin or end during the AM-PM peak hours, it shall provide a Campus entry reservation system, to the satisfaction of LADOT, that shall log and ensure AM-PM peak period trips are not exceeded, and that can be audited by LADOT at any time.

**Enforcement Agency:** City of Los Angeles Department of Transportation

**Monitoring Agency:** City of Los Angeles Department of Transportation

**Monitoring Phase:** Operation

**Monitoring Frequency:** Periodic field inspections during operation

**Action Indicating Compliance:** Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

**PDF-TRAF-14:** Total daily vehicle trips to/from Summer Sports Camps will be limited to 236 trips (118 inbound and 118 outbound), which will be applicable to all vehicles, including shuttles. Pedestrian access shall be restricted in accordance with PDF-TRAF-17.

**Enforcement Agency:** City of Los Angeles Department of Transportation  
**Monitoring Agency:** City of Los Angeles Department of Transportation  
**Monitoring Phase:** Operation  
**Monitoring Frequency:** Periodic field inspections during operation  
**Action Indicating Compliance:** Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

**PDF-TRAF-15:** Homecoming and Athenian Day events shall be held on weekends only.

**Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation  
**Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation  
**Monitoring Phase:** Operation  
**Monitoring Frequency:** Periodic field inspections during operation  
**Action Indicating Compliance:** Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

**PDF-TRAF-16:** Club Sports activities scheduled during the week shall not begin prior to 7:30 PM. Prior to the beginning of each academic year, MSMU shall inform other schools participating in Club Sports activities of this limitation and of the requirements in PDF-TRAF-10, PDF-TRAF-12, and PDF-TRAF-17.

**Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation  
**Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation  
**Monitoring Phase:** Operation  
**Monitoring Frequency:** Periodic field inspections during operation  
**Action Indicating Compliance:** Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

**PDF-TRAF-17:** Concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall institute and thereafter maintain a policy prohibiting entry on to the Campus by all pedestrians except persons meeting one of the following conditions:

- (1) Persons residing within the community around the Campus;
- (2) Persons entering the Campus via bicycle or similar conveyance, as established to the satisfaction of LADOT;
- (3) Persons arriving to the area around the Campus via public transportation, as established to the satisfaction of LADOT; and
- (4) Persons re-entering the Campus after walking outside of the Campus on the same day.

The objective of this PDF-TRAF-17 is to prevent parking by any MSMU users in the surrounding neighborhood. MSMU shall establish that the policy instituted in accordance with PDF-TRAF-17 meets this objective, to the satisfaction of LADOT.

<b>Enforcement Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Operation
<b>Monitoring Frequency:</b>	Concurrent with the issuance of Certificate of Occupancy; Periodic field inspections during operation
<b>Action Indicating Compliance:</b>	Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

**PDF-TRAF-18:** Concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to 1 percent below the 2016 baseline trip counts taken for the Campus (2,160 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Bi-annual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of Transportation

<b>Monitoring Phase:</b>	Concurrent with the issuance of the Certificate of Occupancy and during Operation
<b>Monitoring Frequency:</b>	Two times per year for five consecutive years and thereafter every five years, Periodic field inspections during operation
<b>Action Indicating Compliance:</b>	Biannual approval of two-week trip counts from the City of Los Angeles Department of Transportation; compliance certification report submitted by MSMU

## (2) Mitigation Measures

**MM-TRAF-1:** During construction, in each individual hour within the PM peak period (4 PM to 6 PM), allow a maximum of 37 outbound PCE vehicle trips and 6 inbound PCE vehicle trips.

<b>Enforcement Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	City of Los Angeles Department of Transportation
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Periodic field inspections during construction
<b>Action Indicating Compliance:</b>	Compliance certification report submitted by Project contractor (Construction)