

# **MITIGATION MONITORING PROGRAM**

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## **1. Introduction**

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

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 Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts takes into consideration the project design features (PDF) and identifies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

## **2. Purpose**

The intent of this MMP is to:

1. Verify compliance with the project design features and mitigation measures identified in the EIR;
2. Provide a framework to document implementation of identified project design features 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 project design features and mitigation measures;
6. Establish the frequency and duration of monitoring; and
7. Utilize the existing agency review processes wherever feasible.

### 3. Organization

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

- **Enforcement Agency:** the agency with the power to enforce the PDF or MM.
- **Monitoring Agency:** the agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Monitoring Phase:** the phase of the Project during which the PDF or MM shall be monitored.
- **Monitoring Frequency:** the frequency at which the PDF or MM shall be monitored.
- **Action Indicating Compliance:** the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

### 4. Administrative Procedures and Enforcement

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

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within 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.

### 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 MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary Project-related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

## 6. Mitigation Monitoring Program

### a) Air Quality

#### (1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

#### (2) Mitigation Measures

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

- For off-road diesel-powered construction equipment rated greater than 50 horse power: the equipment shall meet or exceed the CARB and USEPA Tier 4 off-road emissions standards or greater during Project construction or shall be fitted with an emissions control device that achieves diesel emissions reductions that are no less than what could be achieved by an EPA Tier 4 Final engine.
- The Project Applicant shall implement the use of alternatively fueled equipment to the extent feasible for equipment greater than 50 horsepower. Equipment less than 50 horsepower shall be electric plug-in, solar-powered, or alternative fueled (i.e.,

non-diesel). Pole power shall be made available for use of electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.

- Alternative-fueled generators will be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors, and on-site electrical power is not available. The determination of the commercial availability of such equipment will be made by the City prior to the issuance of grading or building permits based on Applicant-provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence obtained by the City from expert sources such as construction contractors in the region.
  - A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with California Air Resources Board's Rule 2449.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
  - **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:** Once during Project plan check; Continuous field inspections during construction, with quarterly reporting
  - **Action Indicating Compliance:** Issuance of applicable building permit; Field inspection sign-off

## b) Cultural Resources

### (1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

### (2) Mitigation Measures

**CUL-MM-1:** Prior to the issuance of a demolition permit, the Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources

encountered. Monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified Archaeologist. At a minimum, the need for monitoring will be reassessed at depths of excavation greater than five feet below surface. Prior to commencement of excavation activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session, to be carried out by the qualified Archaeologist, will focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed if such resources are encountered.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Prior to issuance of demolition permit
- **Action Indicating Compliance:** Issuance of demolition permit

**CUL-MM-2:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the 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 the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to PRC 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 PRC 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 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.

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

- **Monitoring Phase:** Construction
- **Monitoring Frequency:** At time of resource discovery, should it occur
- **Action Indicating Compliance:** Compliance report by Qualified Archaeologist

**CUL-MM-3:** Prior to the release of the grading bond, the qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms for each resource at the conclusion of archaeological 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 of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once after completion of grading/excavation activities
- **Action Indicating Compliance:** Compliance report by Qualified Archaeologist

## c) Geology and Soils

### (1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

### (2) Mitigation Measures

**GEO-MM-1:** A Qualified Paleontologist meeting the Society for Vertebrate Paleontology (SVP) Standards (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction

- **Monitoring Frequency:** Prior to issuance of demolition or grading permit; Periodic during construction activities
- **Action Indicating Compliance:** Issuance of demolition or grading permit; Compliance report by Qualified Paleontologist

**GEO-MM-2:** The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Prior to issuance of demolition or grading permit
- **Action Indicating Compliance:** Issuance of demolition or grading permit

**GEO-MM-3:** Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the direction of the Qualified Paleontologist. Paleontological resources monitoring shall be conducted for all ground disturbing activities in previously undisturbed sediments which have high sensitivity for encountering paleontological resources. Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring needs to be revised based on his/her observations. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed and any discoveries.

If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery, conferred with the City, and made recommendations as to the appropriate treatment. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage, such as the Natural History Museum of Los Angeles County. The Qualified Paleontologist shall prepare a final monitoring and

mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report, which shall be submitted to the appropriate repository and the City.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic
- **Action Indicating Compliance:** Compliance report by Qualified Paleontologist

#### **d) Greenhouse Gas Emissions**

##### **(1) Project Design Features**

See TRAF-PDF-1 (Transportation Demand Management Program) below.

##### **(2) Mitigation Measures**

No mitigation measures are identified in the EIR for this environmental issue.

#### **e) Land Use and Planning**

##### **(1) Project Design Features**

See Project Design Feature POL-PDF-2 (Security Features During Operation), TRAF-PDF-1 (Transportation Demand Management Program), and TRAF-PDF-2 (Construction Traffic Management Plan), below.

##### **(2) Mitigation Measures**

No mitigation measures are identified in the EIR for this environmental issue.

#### **f) Noise**

##### **(1) Project Design Features**

**NOI-PDF-1:** Impact Pile Driving and Blasting Prohibitions. The Project will not use or allow impact pile drivers and will not require or allow blasting during construction activities. Augured or drilled piles are allowed.

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



- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

## (2) Mitigation Measures

**NOI-MM-1:** The Project shall provide temporary ground-level construction noise barriers, with a minimum height of eight feet along Orange Street to the north, South San Vicente to the west, South Sweetzer Avenue to the south, and a minimum height of 15 feet along the alleyway to the northeast/east, equipped with noise blankets or equivalent noise reduction materials rated to achieve sound level reductions of at least 10 dBA between the Project Site and ground-level sensitive receptor locations. These temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptor(s) during the duration of construction activities. Prior to obtaining any permits, documentation prepared by a noise consultant verifying compliance with this measure shall be submitted to the Department of City Planning.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

**NOI-MM-2:** Noise- and vibration-generating construction equipment whose specific location on the Project Site may be flexible (e.g., compressors and generators) shall be located away from the nearest off-site sensitive land uses (at least 100 feet away), or natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such equipment towards these land uses.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

**NOI-MM-3:** The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use that shall achieve a sound level reduction of at least 10 dBA between the Project Site and ground-level sensitive receptor locations.

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

- **Monitoring Frequency:** Ongoing during Project operation
- **Action Indicating Compliance:** Field inspection signoff

**NOI MM-4:** A construction liaison shall be provided to inform the nearby receptors when peak noise and vibration activities are scheduled to occur. Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to properties identified as sensitive receptors that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

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

## **g) Fire Protection**

### **(1) Project Design Features**

See Project Design Features TRAF-PDF-2 (Construction Traffic Management Plan) and TRAF-PDF-3 (Construction Worker Parking Plan), below.

### **(2) Mitigation Measures**

No mitigation measures are identified in the EIR for this environmental issue.

## **h) Police Protection**

### **(1) Project Design Features**

See Project Design Features TRAF-PDF-2 (Construction Traffic Management Plan) and TRAF-PDF-3 (Construction Worker Parking Plan), below.

**POL-PDF-1: Security Features During Construction.** During construction, the Project Site shall be fenced and gated with surveillance cameras to monitor the site during off hours. Security lighting shall also be provided in and around the construction site.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections

- **Action Indicating Compliance:** Field inspection sign-offs

**POL-PDF-2: Security Features During Operation.** During operation of the Project, access to the parking structure shall be controlled through gated entries, and the entry areas shall be well illuminated. Project Site security shall include controlled keycard access to medical office spaces, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV).

- **Enforcement Agency:** City of Los Angeles Department of City Planning, City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning, City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

## (2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

## i) Transportation

### (1) Project Design Features

**TRAF-PDF-1: Transportation Demand Management (TDM) Program.** The Applicant will implement a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program will be subject to review and approval by the Los Angeles Department of City Planning and LADOT. The exact measures to be implemented will be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project. The strategies will include, at a minimum, the following:

- Bicycle facilities including short-term and long-term parking, and onsite lockers and showers in accordance with Planning Code requirements; and
- Marketing and promotions, including a transportation information center, kiosks and/or other on-site measures, such as providing a Tenant Welcome Package (i.e., all new commercial tenants receive information on available alternative modes and ways to access destinations).

- **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:** Pre-construction; Construction; Operation
- **Monitoring Frequency:** Once prior to issuance of building permit; Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation
- **Action Indicating Compliance:** Approval of TDM Program from the City of Los Angeles Department of City Planning and Los Angeles Department of Transportation prior to issuance of building permit; Issuance of Certificate of Occupancy; Field inspection sign-offs

**TRAF-PDF-2: Construction Traffic Management Plan.** Prior to the issuance of a building permit for the Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CTMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CTMP will include, but not be limited to, the following elements as appropriate:

- Advance notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.
- As parking lane and/or travel lane closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, as appropriate.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- Provide off-site truck staging in a legal area furnished by the construction truck contractor. Anticipated truck access to the Project Site will be off of the South San Vicente Boulevard frontage road.

- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
  - Advanced notification of temporary on-street parking removals and duration of removals along the South San Vicente Boulevard frontage road and Orange Street.
  - Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with the Los Angeles Fire Department (LAFD), as necessary.
- **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
  - **Action Indicating Compliance:** Approval of Construction Traffic Management Plan from the Los Angeles Department of Transportation prior to issuance of building permit; Field inspection sign-offs

**TRAF-PDF-3: Construction Worker Parking Plan.** The Applicant will prepare a Construction Worker Parking Plan prior to commencement of construction to identify and enforce parking location requirements for construction workers. The Construction Worker Parking Plan will include, but not be limited to, the following elements as appropriate:

- During construction activities when construction worker parking cannot be accommodated on the Project Site, the plan will identify alternate parking location(s) for construction workers and the method of transportation to and from the Project Site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
  - Construction workers will not be permitted to park on street.
  - All construction contractors will be provided 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.
- **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
  - **Action Indicating Compliance:** Approval of Construction Worker Parking Plan from the Los Angeles Department of Transportation prior to issuance of building permit; Field inspection signoffs

## (2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.