

Mitigation Monitoring Program

This Mitigation Monitoring Program (MMP), which is provided in **Table 4-1, *Mitigation Monitoring Program***, below, has been prepared pursuant to Public Resources Code (PRC) Section 21081.6 and CEQA Guidelines Section 15097 (Title 14 of the California Code of Regulations), which require adoption of an MMP for projects where the Lead Agency has adopted mitigation to avoid significant environmental effects. The City of Culver City (City) is the Lead Agency for the Crossings Campus Project (Project). However, the Project Site includes area within both the City of Culver City and the City of Los Angeles. Therefore, as applicable, the City of Culver City and the City of Los Angeles will be responsible for administering and implementing the MMP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during Project implementation prior to final approval of the Project. The primary purpose of the MMP is to ensure that the mitigation measures identified in the Initial Study (for Biological Resources), Draft EIR, and Final EIR (designated by the respective environmental issue within Chapter 4, *Environmental Impact Analysis*, of the Draft EIR) are implemented, thereby minimizing identified environmental effects.

The MMP also includes project design features identified throughout Chapter 4 the Draft EIR. Because project design features have been incorporated into the Project, they do not constitute mitigation measures. However, project design features are included in this MMP to ensure their implementation as a part of the Project.

Final clearance shall require all applicable verification as indicated in Table 4-1. The City of Culver City and City of Los Angeles will have responsibility for monitoring and reporting the implementation of the project design features and mitigation measures, as applicable, within their respective jurisdictions. The project design features and mitigation measures are identified by the impact category and numbered that correspond with the Initial Study, in the case of Biological Resources, and the Draft EIR.

**TABLE 4-1
MITIGATION MONITORING PROGRAM**

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Aesthetics				
<p>AES-PDF-1: Construction Fencing. Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity for new buildings from view at the street level. A minimum eight-foot-high construction fence will be located along the perimeter of the active construction sites. The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning
<p>AES-PDF-2: Screening of Utilities. Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning
<p>AES-PDF-3: Glare. Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Final glazing choices and trim materials will be evaluated for glare prior to the issuance of a building permit.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>AES-PDF-4: Lighting. Construction and operational lighting will be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner so as to avoid undue glare or light trespass onto adjacent or nearby uses.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning
Air Quality				
<p>AQ-MM-1: Construction Equipment Features. The Project shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:</p> <ul style="list-style-type: none"> • During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered equipment equal to or greater than 50 horsepower that will be used during any portion of the construction activities shall meet or exceed the Tier 4 Final standards. Such equipment will be outfitted with Best Available Control Technology (BACT) devices, including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. Alternate construction equipment 	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>may be used if the construction contractor can document that the equipment would achieve the same or greater NOx reductions compared to Tier 4 Final standards. Construction contractors supplying heavy duty diesel equipment greater than 50 horsepower shall be encouraged to apply for SCAQMD SOON funds. Information including the SCAQMD website shall be provided to each contractor which uses heavy duty diesel for on-site construction activities</p> <ul style="list-style-type: none"> • During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions • Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited. • Construction activities shall be discontinued during an Air Quality Index (AQI) of 151 or more (unhealthy level). A record of any AQI at an unhealthy level and of discontinued construction activities as applicable shall be maintained by the Contractor on-site. 				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Biological Resources				
<p>MM-BIO-1: The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either:</p> <ol style="list-style-type: none"> 1) 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 would ensure that no active nests are disturbed; or 2) If avoidance of the avian breeding season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) is not feasible, then: <ol style="list-style-type: none"> a. A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of construction site boundaries. This two-tiered survey method is intended to provide the Applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary. b. If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be 	<p>Condition of Approval</p>	<p>Plan Check Notes, Reports, Surveys, and Field Inspections</p>	<p>Prior to issuance of a Demolition Permit, Grading Permit, and Building Permit.</p>	<p>Culver City Planning Division; Los Angeles Department of Building and Safety and City Planning</p>

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the Project area.</p> <p>Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division and City of Los Angeles Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds. In addition, pre-construction surveys and/or construction monitoring shall also be submitted to the California Department of Fish and Wildlife (CDFW) within two months of the completion of the monitoring activities.</p>				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Cultural Resources				
<p>CUL-MM-1: Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as demolition, clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.</p> <p>Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety, and City Planning
<p>CUL-MM-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. 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 the Qualified Archaeologist determines the find 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 of Culver City and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to develop a reasonable and feasible 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. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation 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 resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.</p> <p>All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to</p>				<p>Angeles Departments of Building and Safety and City Planning</p>

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City and/or City of Los Angeles, depending on the location/jurisdiction where the resource is located, to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resource(s). 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. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation 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 resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.</p> <p>If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City of Culver City and/or City of Los Angeles, depending on the location/jurisdiction where the resource is located. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Qualified Archaeologist; (2) require the recommendation, as modified by the City, be implemented in a manner that is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally</p>				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
effective to mitigate a potentially significant impact; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts. The Applicant shall pay all costs and fees associated with the mediator.				
<p>CUL-MM-3: The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms 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 Culver City and/or City of Los Angeles depending on the location/jurisdiction where the resource is located, 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.</p>	Condition of Approval	Report	Prior to issuance of a Certificate of Occupancy	Culver City Planning Division, Los Angeles Departments of Building and Safety and City Planning
Geology and Soils				
<p>GEO-MM-1: Prior to the issuance of grading permits, the Applicant shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (Qualified Paleontologist). 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, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
<p>GEO-MM-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments that exceed 10 feet in depth. Monitoring shall</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and	Prior to issuance of Demolition Permit, Grading Permit	Culver City Building Safety Division, Building Safety

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening, per SVP Guidelines (2010). The sample can be collected by construction machinery and stockpiled and processed in a safe location on-site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. If a potential fossil is found, the Qualified Paleontologist shall have authority to temporarily stop excavation activity or to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.</p>		Field Inspections	and Building Permit and Ongoing during Construction	Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety City Planning
<p>GEO-MM-3: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue from sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to</p>	Condition of Approval	Report	Prior to issuance of a Certificate of Occupancy	Culver City Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the City of Culver City and/or City of Los Angeles, depending on the location/jurisdiction where the resource is located, to signify the satisfactory completion of the Project and required mitigation measures.</p>				
Greenhouse Gas Emissions				
<p>GHG-PDF-1: Green Building Features. The Project will include the following green building features:</p> <ul style="list-style-type: none"> • The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code, the City of Los Angeles Green Building Code and Culver City’s Green Building Program Requirements. • The Project design will include sustainability features that will result in increased energy efficiency including water efficiency measures for landscaping and rainwater management, high efficiency plumbing fixtures, energy-star labeled appliances where possible and energy-efficient and water conserving HVAC systems. 	Condition of Approval	Plan Check Notes	Prior to issuance of a Building Permit	Culver City Building Safety Division, Planning Division; Los Angeles Departments of Building and Safety and City Planning
Hazards and Hazardous Materials				
<p>HAZ-MM-1: Health and Safety Plan. Before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition on parcels within the Project Site, the Applicant for the specific work proposed shall</p>	Condition of Approval	Plan Check Notes, Field Inspections	Prior to issuance of a Demolition or Grading Permit; Construction	Culver City Building Safety Division, Building Safety Inspector; Public

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>require that the construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP) in accordance with federal Occupational Safety and Health Administration regulations (29 CFR 1910.120) and California Occupational Safety and Health Administration regulations (8 CCR Section 5192).</p> <p>The HASP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing and structure demolition activities. HASPs shall be submitted to Culver City and the City of Los Angeles building departments and any applicable oversight regulatory agency for review before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The HASP shall include, but not be limited to, the following elements:</p> <ul style="list-style-type: none"> • Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HASP. • A summary of all potential risks to demolition and construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals. • Specified personal protective equipment and decontamination procedures, if needed. • The requirement to prepare documentation showing that HASP measures have been implemented during construction (e.g., tailgate safety meeting notes with signup sheet for attendees). • A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor. • Emergency procedures, including the route to the nearest hospital. 			(during soil-disturbing activities)	Works, Engineering and Planning Division; Los Angeles Building and Safety Department

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<ul style="list-style-type: none"> Procedures to follow if evidence of potential soil or groundwater contamination is encountered (such as soil staining, noxious odors, debris or buried storage containers). These procedures shall be followed in accordance with hazardous waste operations regulations and specifically include, but not be limited to, immediately stopping work in the vicinity of the unknown hazardous materials release; notifying the city within which the contamination is encountered and the regulatory agency overseeing site cleanup, if any; and retaining a qualified environmental firm to perform sampling and remediation, if warranted. 				
<p>HAZ-MM-2: Soil and Groundwater Management Plan. In support of the HASP described in Mitigation Measure HAZ-MM-1, the contractor conducting excavation and disposal of fill and soil shall develop and implement a soil and groundwater management plan (SGMP) for the management of soil, soil gas, and groundwater before any ground-disturbing activity to manage contaminated materials, if encountered. The SGMP shall include the following, at a minimum:</p> <ul style="list-style-type: none"> Site description, including the hazardous materials that may be encountered. Roles and responsibilities of on-site workers, supervisors, and the regulatory agency. Training for site workers focused on the recognition of and response to encountering hazardous materials or unknown structures, e.g., underground storage tanks (USTs). Notification requirements in the event of discovery of unknown structures or contamination. Protocols for the materials (fill, soil, and dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner. 	Condition of Approval	Plan Check Notes, Field Inspections	Prior to issuance of a Demolition or Grading Permit; Construction (during soil-disturbing activities)	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<ul style="list-style-type: none"> Reporting requirement to the overseeing regulatory agency, if any contamination is found that requires agency oversight, documenting that site activities were conducted in accordance with the SGMP. <p>The SGMP shall be submitted to Culver City and the City of Los Angeles Building Departments for review to inform their permit approval process before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The contract specifications shall mandate full compliance with all applicable federal, state, and local regulations related to the identification, transportation, and disposal of hazardous materials.</p> <p>The SGMP shall include measures to remove and/or treat/remediate the impacted soils and groundwater in a manner that is protective of human health and the environment and compatible with office use, in compliance with all applicable regulatory standards, under supervision of a qualified environmental professional. The SGMP shall describe measures for (i) management of excavated soils and groundwater, (ii) characterization of soils to determine whether they qualify as hazardous waste under regulations such as 22 C.C.R. Section 66262.11 or other regulations identified in the SGMP or otherwise identified by the oversight agencies, and (iii) off-site disposal of excavated soils and disposal of dewatered groundwater in compliance with all applicable regulations. The SGMP shall also provide measures for the evaluation of vapor intrusion risk at the Project site, and if necessary, modification of the Project design and/or installation of a vapor intrusion mitigation system consistent with the procedures and performance standards set forth in DTSC's October 2011 Vapor Intrusion Mitigation Advisory or as otherwise determined applicable by the oversight agency (i.e., applicable city building departments) at the time of construction. For example, as part of the vapor intrusion</p>				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>evaluation, at least two rounds of indoor and garage air sampling (including the parking level 1 office space) shall be conducted post-construction to confirm that future workers, valet parking personnel, and workers within the parking level 1 office space are protected and potential human health risks due to vapor intrusion are at or below target risk levels established by DTSC, as applicable. Sampling activities shall include collection of samples when the HVAC system is on and off and also when the parking garage ventilation system is on and off. Given that benzene is a component of gasoline and will be present in the garage due to the parked cars, the air sampling activities shall focus on PCE to confirm that residual PCE in soil vapor does not pose a significant vapor intrusion risk to office workers, valet parking personnel, and workers working within the parking level 1 office space. The first round of sampling should be conducted before the buildings are occupied and the garages are in use. These air sampling activities will aid in the evaluation of the efficacy of the liner and the garage itself to mitigate vapor intrusion. These sampling activities will also help evaluate if any preferential pathways (e.g., utility conduits and elevator shaft) need to be addressed. The second round of sampling shall be conducted either 1) after preferential pathways have been mitigated, if any are identified based on the first round of sampling, 2) during the summer months if the first round of sampling was conducted during the fall or winter and air concentrations were below screening levels, 3) or a few months after the first round if it was conducted during the spring or summer and air concentrations were below screening levels. In the event the indoor air data indicate that risks are above target DTSC risk levels, as applicable, after pathways are sealed, the garage's ventilation system shall be adjusted to reduce vapor intrusion levels below acceptable risk levels, as applicable.</p>				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>For work that would encounter groundwater, as part of the SGMP, contractors shall include a groundwater dewatering control and disposal plan specifying how groundwater (dewatering effluent) will be handled and disposed of in a safe, appropriate, and lawful manner. The groundwater portion of the SGMP shall include the following, at a minimum:</p> <ul style="list-style-type: none"> • The locations at which groundwater dewatering is likely to be required. • Test methods to analyze groundwater for hazardous substances. • Appropriate treatment and/or disposal methods. • Discussion of discharge to a publicly owned treatment works or the stormwater system, in accordance with any regulatory requirements the treatment works may have, if this effluent disposal option is to be used. 				
Noise				
<p>NOI-PDF-1 : Project Construction Schedule. Prior to issuance of a building permit, notice of the Project construction schedule will be provided to abutting property owners and occupants. Evidence of such notification will be provided to the appropriate department of City of Culver City and City of Los Angeles. The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).</p>	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>NOI-PDF-2: Use of Impact Pile Driver. The Project will not require or allow the use of impact pile drivers. Lower noise-and vibration-generating vibratory pile drivers and drills will be used.</p>	<p>Condition of Approval</p>	<p>Plan Check Notes, Reports, and Field Inspections</p>	<p>Prior to issuance of a Building Permit and Ongoing during Construction</p>	<p>Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning</p>
<p>NOI-PDF-3: Construction Rules Sign. During all phases of construction, a “Construction Rules Sign” that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at both City of Los Angeles and City of Culver City will be notified for such incidences. These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of both cities.</p>	<p>Condition of Approval</p>	<p>Plan Check Notes and Field Inspections</p>	<p>Prior to issuance of a Building Permit and Ongoing during Construction</p>	<p>Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning</p>
<p>NOI-PDF-4 (Compliance with Noise Element): The following noise standards from Policy 2.A of the City’s General Plan Noise Element shall be complied with at all times:</p> <ul style="list-style-type: none"> A. No construction equipment will be operated without an exhaust muffler, and all such equipment will have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original manufacturer supplied equipment; B. All construction equipment will be properly maintained to minimize noise emissions; C. If any construction vehicles are serviced at an on-site location, the vehicle(s) will be setback from any street and other property lines so as to maintain a distance of at least 	<p>Condition of Approval</p>	<p>Plan Check Notes and Field Inspections</p>	<p>Prior to issuance of a Building Permit and Ongoing during Construction</p>	<p>Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning</p>

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>100 feet from the public right-of-way and from Noise Sensitive Receptors;</p> <p>D. Noise levels from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) will be minimized by proper selection of equipment and the installation of parapets or other acoustical shielding as approved by the Planning Manager; and</p> <p>E. The Project will not allow any delivery truck idling for more than 5 minutes in the loading area. Signs will be posted prohibiting such idling.</p>				
<p>NOI-PDF-5: Neighborhood Streets. No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
<p>NOI-PDF-6: Mechanical Equipment Noise. All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources and City of Los Angeles Municipal Code Section 112.02 through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Mechanical Permit for subject mechanical equipment	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
<p>NOI-PDF-7: Loading Dock Operating Hours. On-site loading dock operating hours will be limited to 7:00 a.m. to 10:00 p.m.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Ongoing during operation	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
				Planning Division; Los Angeles Departments of Building and Safety and City Planning
<p>NOI-PDF-8: Noise Control – Amplified Sound Systems. If the Project installs permanent outdoor amplified sound systems, the systems will be located in the central courtyard such that the sound would be blocked by the proposed on-site building from off-site receivers. No amplified sound systems would be installed in the publicly accessible areas along the Project’s street frontages. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing entertainment on an ongoing basis which is audible at the subject property line. The systems will be designed so as not to result in a perceivable increase in noise beyond the Project Site. Specifically, daytime outdoor amplified sound systems will not result in an increase of 3 dBA L_{eq} over existing ambient noise conditions at the Project property line. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996) and LAMC Section 112.01, which states that a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation, respectively, within the City of Culver City and City of Los Angeles jurisdiction. All speakers will have a minimum setback of 25 feet from the Project property line and will be directed internally and acoustically shielded from off-site uses. Under the rare occasion of maximum crowd gathering in the central courtyard with temporary amplified sound systems, the combined sound level from speakers and people conversation shall not exceed the ambient noise level plus 5 dBA at an adjacent property line,</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>which would limit the speaker sound level to a maximum of 90 dBA when measured at a distance of 50 feet from the speakers. A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City and City of Los Angeles that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.</p>				
<p>NOISE-MM-1: Prior to the commencement of demolition, the Project shall provide a temporary 12-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 10 dBA along the northern and western boundaries of the Project Site, between the Project Site and the surrounding residences to the north and west. In addition, a temporary 6-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 5 dBA along the southern boundary along Washington Boulevard, between the Project Site and the residences to the south and east of the Project Site. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the nearby noise-sensitive receptors during the duration of construction activities to the extent feasible. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel. At Plan Check at City of Culver City and City of Los Angeles, the Applicant shall provide a study conducted by a noise expert that demonstrates the sound barriers would achieve these required dBA reductions. The study will include a fencing/sound barrier plan for City review.</p>	<p>Condition of Approval</p>	<p>Plan Check Notes and Field Inspections</p>	<p>Prior to issuance of a Demolition Permit, Verified at Preconstruction Meeting with City of Culver City and City of Los Angeles and Ongoing during Construction.</p>	<p>Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning</p>

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>NOISE-MM-2: Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
Public Services				
<p>POL-PDF-1: Project Site Security and Access During Construction. During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit, Building Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Police Department; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety, Public Works, Fire and Police Departments
<p>POL-PDF-2: Project Site Security and Access During Operation. During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will be well illuminated. Project Site security would include controlled keycard access to office spaces,</p>	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Police Department; Public Works, Engineering and

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).				Planning Division; Los Angeles Department of Building and Safety, Public Works, Fire and Police Departments
Transportation				
<p>TRAF-PDF-1: Construction Management Plan. A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning staff for the Cities of Culver City and Los Angeles, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.</p> <p>Prior to commencement of construction, the contractor will advise each City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City and/or City of Los Angeles staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and</p>	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to Demolition, Grading and Building Permits, and Ongoing during Construction	Culver City Building Safety, Planning, Public Works, Fire and Police Departments; Los Angeles Department of Transportation, and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>sidewalks) during peak traffic periods, and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.</p> <p>Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City community meeting guidelines, to discuss and provide the following information to the surrounding community:</p> <ol style="list-style-type: none"> 1. Construction schedule and hours. 2. Framework for construction phases. 3. Identify traffic diversion plan by phase and activity. 4. Potential location of construction parking and office trailers. 5. Truck hauling routes and material deliveries (i.e., identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). 6. Emergency access plan. 7. Demolition plan. 8. Staging plan for the concrete pours, material loading and removal. 9. Crane location(s). 10. Accessible Applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers). 11. Community notification procedures. <p>The CMP shall at a minimum include the following:</p> <ol style="list-style-type: none"> 1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations . 				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<ol style="list-style-type: none"> 2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided. 3. Construction plans and procedures to address community and both the appropriate Cities of Culver City and Los Angeles personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project’s Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses. 4. Procedures for the training and certification of flag persons. 5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas. 6. The location of temporary power, portable toilet and trash and materials storage locations. 7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by either the City of Culver City or the City of Los Angeles, depending on the jurisdiction of the roadway. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles and City of Culver City, will be developed and 				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the fire and police departments of each City to minimize potential effects on traffic flow and emergency response.</p> <p>8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.</p>				
<p>TRAF-PDF-2: Transportation Demand Management (TDM) Program. The Project will implement the following TDM measures subject to Culver City Transportation Department and LADOT review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site:</p> <ul style="list-style-type: none"> • TDM Support Services: The Project will offer tailored trip planning assistance with in-house TDM coordinators. Assistance will be available for all employees online, by email, and by phone. The Project will also host a virtual kiosk every week to chat with a team member and have any questions answered. • Marketing and Communications: The Project will provide a comprehensive website detailing alternative 	Condition of Approval	Approval of Plan	During Plan Check and prior to issuance of a Certificate of Occupancy	Culver City Traffic Engineering, Engineering/Public Works, Transportation Department and Planning Division; Los Angeles Department of Transportation, and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>transportation options such as carpool, rail, shuttle, coach, bike, and options available for transportation once on campus. To provide transportation information to new employees, the Commute Program will make a presentation at New Employee Orientation. The Commute Program will also actively monitor email lists and group lists to discuss and collaborate with employees on improving commute programs. Information dissemination tools will include monthly news updates, web updates, email templates, lobby information centers, communication regarding service expansions, and attending internal employee events.</p> <ul style="list-style-type: none"> • Public Transit: The Project will be served by an existing fixed-route intercampus shuttle program to provide connections to other Applicant-occupied buildings in Culver City and to public transit. The Project will also offer a monthly transit subsidy which provides a financial incentive for riding transit instead of driving to the Project Site. • Rideshare: The Project will provide an online tool that matches riders with drivers originating from similar locales. This will reduce single occupancy vehicle trips to and from the Project. • Bicycling: In addition to providing Code-required bicycle parking and shower facilities, the Project will provide a monthly subsidy to employees who commute by bicycle to work, which can be used to pay for bicycle, maintenance, and storage, or towards upgrading an existing bicycle or purchasing a new bicycle. The Project will also promote cycling by participating in the County's annual Bike to Work Day, providing discounts on select cycling products, providing a website that has information on safe cycling and cycling apps. 				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<ul style="list-style-type: none"> • Walking: The Project will provide enhanced access points to the site to improve pedestrian connectivity and expand adherence to the Americans with Disabilities Act (ADA). Employees will be educated on local neighborhood destinations within walking distance and will be encouraged to walk to events, meetings, and meals whenever possible. The areas surrounding the walkways and sidewalks will be well-landscaped and maintained, with pedestrian-oriented lighting to contribute to the safety of walking at night. • Pre-tax Commuter Benefit: A pre-tax commuter benefit will be provided to employees for commute-related expenses such as public transit (after the transit subsidy), vanpooling, and parking. The commuter benefit will supplement the transit and bicycle subsidies. • Commuter Club: A Commuter Club is an opt-in program that offers employees the opportunity to receive Commute Program email updates about schedule updates, new service, events, and programs. • Commute Expert Program: This program will provide people using a commute alternative an opportunity to meet other employees who are using the same mode who can “mentor” them by providing answers to questions about using that mode, stop locations, routes, or local transit options. • Guaranteed Ride Home Program: The Project will sponsor a guaranteed ride home for Project Site employees who came to work without their own car in the event of an unexpected situation or emergency when walking, biking, carpooling, or taking transit home will not be feasible. • Intercampus Shuttles: The Project will provide on-request fixed route intercampus shuttles between Apple-occupied buildings during work hours as well as 				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>commuter shuttles from select points in and around the Los Angeles basin to the Project site during morning and evening commute hours.</p> <ul style="list-style-type: none"> • Campus Bike Share Program: A Campus Bike Share program will be implemented to provide a transportation option between other buildings occupied by the Applicant. Campus bikes will be equipped with GPS tracking and an electronic rear-wheel lock to help secure the fleet. Campus bikes will be managed and maintained by a local bike maintenance vendor. • On-site Services: The Project will provide its employees with on-site amenities such as a full-service cafeteria, coffee bars, and shower facilities. The offered services will contribute to limiting the number of vehicle trips employees will need to take off-site during the day. 				
Tribal Cultural Resources				
<p>TCR-MM-1: Prior to the issuance of a demolition permit for the Project, the Applicant shall retain a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively “ground disturbing activities”). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City of Culver City and City of Los</p>	<p>Condition of Approval</p>	<p>Plan Check Notes, Reports, Surveys and Field Inspections</p>	<p>Prior to issuance of Demolition Permit and Ongoing during Construction</p>	<p>Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety and City Planning</p>

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>Angeles prior to the issuance of demolition permit for the Project.</p> <p>Prior to commencement of ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session.</p> <p>Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.</p>				
<p>TCR-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City of Culver City and/or City of Los Angeles upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this</p>	<p>Condition of Approval</p>	<p>Field Inspections</p>	<p>Ongoing during Construction</p>	<p>Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Department of Building and Safety and City Planning</p>

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>measure if the Native American Monitor fails to complete or submit any such monitoring logs.</p>				
<p>TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.</p> <p>Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City of Culver City and/or City of Los Angeles depending on the location/jurisdiction where the resource is located to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City of Culver City and/or City of Los Angeles determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the appropriate City’s Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable</p>	<p>Condition of Approval</p>	<p>Field Inspections</p>	<p>Ongoing during Construction</p>	<p>Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning</p>

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.</p> <p>If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant and the City of Culver City and/or City of Los Angeles. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City of Culver City and/or City of Los Angeles shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator.</p> <p>The Applicant may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs.</p> <p>The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-</p>				

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.</p> <p>Notwithstanding the above paragraph, any information determined to be confidential in nature by the City of Culver City and/or City of Los Angeles Attorney’s office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code Section 6254(r).</p>				
Utilities and Service Systems				
<p>WATER-PDF-1: Water Conservation. The Project will implement water conservation measures that include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Fixtures <ul style="list-style-type: none"> – High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less – Showerheads with a flow rate of 1.5 gallons per minute, or less – All utility, service and mop sinks will have a maximum flow rate of 1.5 gallons per minute – Condensate drain water capture and reuse for irrigation – An air cooled / air source mechanical cooling system will be utilized in lieu of cooling towers. 	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering, and Planning Division; Los Angeles Departments of Building and Safety and City Planning

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<ul style="list-style-type: none"> • Landscape and Irrigation <ul style="list-style-type: none"> – California Friendly® plants or native plants – Drip/ Subsurface Irrigation (Micro-Irrigation) – Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together) – Weather Based Irrigation Controllers • Utilities <ul style="list-style-type: none"> – Individual metering and billing for water use for every commercial unit 				