

IV. Mitigation Monitoring Program

1. Introduction

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Section 21081.6 of the Public Resources Code (PRC), which requires a lead agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the California Environmental Quality Act (CEQA) Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Section 21081.6 of the PRC, and Section 15097 of the CEQA Guidelines.

The City of Los Angeles (City) is the Lead Agency for the 4th and Hewitt Project (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 in the EIR takes into consideration the project design features (PDF) and applies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

2. Purpose

It is the intent of this MMP to provide a record of the project design features and mitigation measures that are required of the Project; identify the responsible enforcement and monitoring agencies; establish the phase, frequency, and duration of monitoring; and convey the manner by which the Project is required to achieve compliance and the materials that document compliance for the record.

3. Organization

As shown in this MMP, 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 project design feature or mitigation measure.
- **Monitoring Agency:** the agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Monitoring Phase:** the phase of the Project during which the project design feature or mitigation measure shall be monitored.
- **Monitoring Frequency:** the frequency at which the project design feature or mitigation measure shall be monitored.
- **Action(s) Indicating Compliance:** the action(s) by which the Enforcement or Monitoring Agency indicates that compliance with the identified project design feature or mitigation measure has been implemented.

4. Administrative Procedures and Enforcement

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

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

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the

Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency of any non-compliance with the project design features and mitigation measures 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 project design features and mitigation measures contained in this MMP. The enforcing departments or agencies may determine substantial conformance with project design features and mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a project design feature and mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines, Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the project design features and mitigation measures. Any addendum or subsequent CEQA clearance shall explain why the project design feature or mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a project design feature or mitigation measure shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the project design feature or mitigation measure 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

AQ-PDF-1: The Applicant will make a reasonable effort to attain diesel-powered equipment that will meet United States Environmental Protection Agency Tier 4 Final emission reduction technology for nonroad diesel engines to utilize during the construction period.

- **Enforcement Agency:** Los Angeles Department of Building and Safety; South Coast Air Quality Management District
- **Monitoring Agency:** Los Angeles Department of City Planning; or Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during Project plan check (requiring proof of compliance); Periodically during field inspection
- **Action Indicating Compliance:** Project plan approval; Issuance of applicable building permit (requiring proof of compliance); Field inspection sign-off

b) Cultural Resources

(1) Mitigation Measures

CUL-MM-1 Archaeological Resource Monitoring. Prior to the issuance of a demolition permit, the Applicant or its Successor shall retain a Qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction activities on the Project Site such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The activities to be monitored shall also include off-site improvements in the vicinity of the Project Site, such as utility, sidewalk, or road improvements. The monitor shall have the authority to direct the pace of construction equipment in areas of high sensitivity. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), and the depth of excavation, and if found, the abundance and type of

archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Archaeologist. Prior to commencement of excavation activities, an archaeological Sensitivity Training shall be carried out by the Qualified Archaeologist, focusing on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** To be determined by consultation with the Qualified Archaeologist if resources are discovered
- **Action Indicating Compliance:** Field inspection sign-off

CUL-MM-2 Archaeological Resource Discovery. In the event that historic or prehistoric 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. A 50-foot buffer 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 California Environmental Quality Act (CEQA) Guidelines Section 15064.5 (a) or a “unique archaeological resource” pursuant to Public Resources Code (PRC) Section 21083.2 (g), the Qualified Archaeologist shall coordinate with the Applicant and the Department of City Planning to develop a formal treatment plan that would serve to reduce impacts to the resources. If any prehistoric archaeological sites are encountered within the Project area, consultation with interested Native American parties shall be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines Section 15064.5(f) for historical resources and PRC Section 21083.2(b) for unique archaeological resources. As noted in California Code of

Regulations Section 15126.4(b)(A), preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City's Office of Historic Resources and with final approval by the Department of City Planning, it is determined that preservation in place is not feasible, appropriate treatment of the resources shall be developed by the Qualified Archaeologist and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological materials, they shall be donated to a local school or historical society in the area for educational purposes.

- **Zanja Conduit System Discovery.** In the event that Zanja Conduit System-related infrastructure is 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 exclusion area that accounts for the linear nature of the resource shall be established by a Qualified Archaeologist, meeting the Secretary of the Interior Standards in Archaeology. Construction activities shall not be allowed to continue within the exclusion area until directed by the Qualified Archaeologist in consultation with the Department of City Planning, but work shall be allowed to continue outside of the exclusion area. The Qualified Archaeologist shall coordinate with the Applicant or its Successor, the Department of City Planning, and the City's Office of Historic Resources (OHR) to develop a formal treatment plan for the resource that would serve to mitigate impacts to the resource(s). The treatment measures listed in California Code of Regulations Section 15126.4(b) shall be considered when determining appropriate treatment for the Zanja resource. Treatment shall be designed to address the Zanja resource's eligibility under Criterion 1 (significant events) and 4 (scientific data) as well as eligibility as a unique archaeological resource of the likely form of the Zanja, to the best of current knowledge (e.g., is it assumed to be made of wood/concrete/earthen etc., based on known archival research) and may include implementation of data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. At a minimum, a commemoration program that includes the development of an interpretive exhibit/display/signage or plaque at the Project Site shall be developed. In addition, other public educational and/or

interpretive treatment measures shall be developed as determined appropriate by the Qualified Archaeologist in consultation with the OHR. Any associated artifacts collected that are not made part of the interpretation/education collection shall be curated or donated as specified above (see “Archaeological Resource Discovery”).

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** To be determined by consultation with the Qualified Archaeologist if resources are discovered
- **Action Indicating Compliance:** Field inspection sign-off

CUL-MM-3 Archaeological Resource Documentation. Following the conclusion of archaeological monitoring but prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and complete the appropriate California Department of Parks and Recreation Site Forms. The report shall include a description of archaeological resources unearthed (Zanja-related or other archaeological resources), if any; treatment of the resources; results of the artifact processing, analysis, research; and an evaluation of the resources with respect to the California Register and the California Environmental Quality Act. The report and the Site Forms shall be submitted by the Project Applicant or its Successor to the Department of City Planning, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.

- **Enforcement Agency:** Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check
- **Action Indicating Compliance:** Project plan approval; Issuance of building permit

c) Hazardous and Hazardous Materials

(1) Mitigation Measures

HAZ-MM-1 Following demolition of on-site structures and prior to redevelopment of the Project Site, the Applicant shall retain a qualified environmental professional to perform a Supplemental Phase II Subsurface Site Investigation. The Supplemental Phase II Subsurface Site Investigation shall focus on soils in those areas that were identified as inaccessible during the Phase II Subsurface Site Investigation: the areas of the on-site wastewater clarifier, auto repair floor pit, and wastewater separator structures. In addition, due to the low level of petroleum hydrocarbons reported at B2 at 10 feet below ground surface (bgs), the Supplemental Phase II Subsurface Site Investigation shall also include the area of the former truck wash rack. In the event that soils contaminated by petroleum products or other hazardous chemicals are encountered during the investigation, a qualified environmental professional shall be retained to oversee the proper characterization and disposal of waste and remediation of impacted soil and/or materials, as necessary.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once at Project plan check (requiring proof of compliance); Once during field investigation
- **Action Indicating Compliance:** Project plan approval; Issuance of grading permit; Field inspection sign-off

HAZ-MM-2 Prior to the commencement of soil-disturbing activities, the Applicant shall retain a qualified environmental professional to prepare a Soil Management Plan for review and approval by the City of Los Angeles Department of Building and Safety. Soil-disturbing activities include excavation, grading, trenching, utility installation or repair, and other human activities that may potentially bring contaminated soil to the surface. The approved Soil Management Plan shall be implemented during soil-disturbing activities on the Project Site and shall establish policies and requirements for the testing, management, transport, and disposal of soils. The Soil Management Plan shall describe specific soil-handling controls required to assure compliance

with local, State and federal overseeing agencies, as well as to prevent unacceptable exposure to contaminated soil and prevent the improper disposal of contaminated soils, if encountered.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety; Department of Toxic Substances Control; or Los Angeles Regional Water Quality Control Board
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once prior to issuance of grading permit; Ongoing with periodic field inspections during construction for Soil Management Plan implementation
- **Action Indicating Compliance:** Approval of Soil Management Plan; Issuance of grading permit; Compliance report by a qualified environmental consultant

d) Greenhouse Gas Emissions

(1) Project Design Features

GHG-PDF-1: The Office Building will be designed to achieve the equivalent of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver Certification level for new buildings. Prior to the issuance of building permits, documentation that indicates the Office Building is designed to achieve the number of points that would be required for LEED Silver Certification will be provided to the City. The specific sustainability features that will be integrated into the Project design to enable the Project to meet this standard may include, but will not be limited to, the following:

- Use of Energy Star rated products and appliances.
- Use of high-efficiency wall and/or roof insulation.
- Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety

- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Ongoing during field inspection
- **Action Indicating Compliance:** Issuance of building permit; Field inspection sign-off

e) Noise and Vibration

(1) Project Design Features

NOI-PDF-1: All capable diesel-powered construction vehicles will be equipped with exhaust mufflers, aftermarket dampening systems, or other suitable noise reduction devices.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Ongoing with periodic field inspection during construction
- **Action Indicating Compliance:** Issuance of demolition permit; Field inspection sign-off

NOI-PDF-2: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Ongoing with periodic field inspection during construction

- **Action Indicating Compliance:** Issuance of demolition permit; Field inspection sign-off

NOI-PDF-3: Grading and construction contractors will use rubber-tired equipment rather than metal-tracked equipment.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Ongoing with periodic field inspection during construction
- **Action Indicating Compliance:** Issuance of grading permit; Field inspection sign-off

NOI-PDF-4: An on-site construction manager will be responsible for responding to local complaints about construction noise. Notices will be sent to residential units within 500 feet of the construction site and signs will be posted at the construction site that list the telephone number for the on-site construction manager.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once before the onset of demolition activities to confirm signs/notices are posted
- **Action Indicating Compliance:** Issuance of demolition permit; Field inspection sign-off

NOI-PDF-5: Construction supervisors will be informed of Project-specific noise requirements, noise issues for sensitive land uses adjacent to the Project construction Site, and/or equipment operations to ensure compliance with the required regulations and best practices.

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

- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at the onset of demolition activities and as needed when new personnel begin work
- **Action Indicating Compliance:** Field training sign-off

NOI-PDF-6: Rooftop mechanical equipment, including heating, ventilation, and air conditioning (HVAC) systems, will be acoustically screened from off-site locations and will include vibration-attenuation mounts.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at Project plan check; Once at field inspection
- **Action Indicating Compliance:** Issuance of occupancy permit; Field inspection sign-off

(2) Mitigation Measures

NOI-MM-1 Subject to off-site property owner agreement, a temporary construction barrier on the rooftop of 428 South Hewitt Street, near the edge of the rooftop facing the Project Site, shall be erected during the Project demolition and grading phases and when equipment is used on the ground floor during building construction and paving. The barrier shall be least four feet in height and constructed of a material with a Sound Transmission Class (STC) rating of at least STC-30 (such as acoustic panels or sound barrier products) or a transmission loss of at least 20 decibels (dB) at 500 hertz (such as 1/2-inch plywood). In addition to the rooftop barrier, a temporary construction barrier of approximately 300 feet in length and 24 feet in height, located at the eastern edge and southeastern corner of the Project Site, and constructed of a material with a rating of STC-35 or greater (such as acoustic panels or sound barrier products) or providing a transmission loss of at least 25 dB at 500 hertz (such as 3/4-inch plywood), shall be erected during the Project demolition and grading phases and when equipment is used on the ground floor during building construction and paving.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once at field inspection
- **Action Indicating Compliance:** Issuance of demolition, grading, and building permits; Field inspection sign-off

NOI-MM-2 Prior to demolition, the Applicant shall retain the services of a structural engineer or other qualified professional to conduct pre-construction surveys to document the current physical conditions of the following identified vibration-sensitive receptors: 418 Colyton Street, 424 Colyton Street, and 427 South Hewitt Street.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once at Project plan check
- **Action Indicating Compliance:** Issuance of demolition permit

NOI-MM-3 Prior to the issuance of grading permits, the Applicant shall retain the services of a structural engineer or other qualified professional to prepare a demolition and shoring plan to ensure the proper protection and treatment of the properties at 418 Colyton Street, 424 Colyton Street, and 427 South Hewitt Street during construction. The plan shall include appropriate measures to protect these properties from damage due to demolition of existing structures, excavation or other ground-disturbing activities, vibration, soil settlement, and general construction activities. The plan shall be submitted to the City of Los Angeles' Office of Historic Resources for review and approval.

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

- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Ongoing with periodic field inspection during construction
- **Action Indicating Compliance:** Demolition and Shoring Plan approval; Issuance of demolition, grading, and building permits

NOI-MM-4 Prior to the issuance of grading permits, the Applicant shall retain the services of an acoustical engineer or other qualified professional to develop and implement a structural monitoring program during construction. The performance standards of the structural monitoring program shall include the following:

- Documentation, consisting of video and/or photographic documentation of accessible and visible areas on the exterior of the receptor buildings (refer to NOI-MM-2).
- A registered civil engineer, certified engineering geologist, or vibration control engineer shall review the appropriate vibration criteria for the identified vibration receptors, taking into consideration their age, construction, condition, and other factors related to vibration sensitivity in order to develop additional recommendations for the structural monitoring program.
- Vibration sensors shall be installed on and/or around the identified vibration receptors to monitor for horizontal and vertical movement. These sensors shall remain in place for the duration of excavation, shoring, and grading phases.
- The vibration sensors shall be equipped with real-time warning system capabilities that can immediately alert construction supervisors when monitored vibration levels approach or exceed threshold limits. The registered civil engineer, certified engineering geologist, or vibration control engineer shall determine the appropriate limits.
- Should an exceedance of vibration thresholds occur, work in the vicinity of the affected area shall be halted and the respective vibration receptor shall be inspected for any damage. Results of the inspection shall be logged. In the event that damage occurs, the damage shall be repaired in consultation with a qualified preservation consultant. In the event of an exceedance, feasible

steps to reduce vibratory levels shall be undertaken, such as halting/staggering concurrent activities and utilizing lower-vibratory techniques.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Office of Historic Resources; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Ongoing with periodic field inspection during construction
- **Action Indicating Compliance:** Approval of Structural Monitoring Program; Issuance of demolition, grading, and building permits

f) Public Services – Police Protection Services

(1) Project Design Features

POL-PDF-1: Prior to issuance of a demolition permit, the Project will:

- Provide security fencing around the perimeter of the Project Site during the construction phase; and
- Provide on-site security personnel whose duties will include construction site entrance and exit monitoring.

Prior to issuance of a certificate of occupancy, the Project will:

- Provide on-site security personnel whose duties will include Office Building (including parking levels) video surveillance monitoring and fire/life/safety system monitoring; and
- Provide adequate security lighting of parking areas, elevators, lobbies, and pathways for pedestrian orientation and to reduce areas of concealment.

The Applicant will consult with the Los Angeles Police Department (LAPD) to ensure that available and feasible crime prevention features have been incorporated during the construction period and into the Project design and receive LAPD's approval.

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

- **Monitoring Agency:** Los Angeles Department of City Planning; Los Angeles Police Department; or Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction (security fencing around the Project site during construction); Construction (security personnel during construction); Post-Construction (security personnel during operations, video surveillance, and lighting)
- **Monitoring Frequency:** Once at Project plan check; Ongoing with periodic field inspection during construction; Once following occupancy during field inspection
- **Action Indicating Compliance:** Project plan approval; LAPD approval of compliance documentation; Issuance of Certificate of Occupancy; Field inspection sign-off

POL-PDF-2: Emergency Procedures Plan. Prior to the issuance of a certificate of occupancy, the Applicant or its successor will develop an Emergency Procedures Plan that addresses emergency concerns and practices and provides a diagram that illustrates each portion of the property, including access routes. The plan will be submitted to the Los Angeles Police Department (LAPD) Central Area Commanding Officer for review and approval.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Police Department; or Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Police Department
- **Monitoring Phase:** Post-Construction
- **Monitoring Frequency:** Once at Project plan check (requiring Emergency Procedures Plan)
- **Action Indicating Compliance:** Project plan approval; LAPD approval of Emergency Procedures Plan; Issuance of Certificate of Occupancy

g) Transportation

(1) Project Design Features

TRANS-PDF-1: Construction Traffic Management Plan. The Applicant will prepare and submit a detailed Construction Traffic Management Plan to the City for review and approval. The Construction Traffic Management Plan will include temporary street closure information, a detour plan, haul routes, and an equipment staging plan. The Construction Traffic Management Plan will formalize how construction will be carried out and identify

specific actions that will be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advanced notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.
- Prohibition of construction worker parking on adjacent residential streets.
- Prohibition of construction-related vehicle parking on surrounding public streets.
- Temporary pedestrian and vehicular traffic controls during all construction activities adjacent to East 4th Street, Colyton Street, and South Hewitt Street to ensure traffic safety on public rights-of-way. These controls shall include, but are not limited to, flag people trained in pedestrian and student safety.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, including along all identified Los Angeles Unified School District (LAUSD) pedestrian routes to nearby schools.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools.
- Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.
- Advanced notification of temporary parking removals and duration of removals.
- Provision of detour plans to address temporary road closures during construction.
- **Enforcement Agency:** Los Angeles Department of Transportation; Los Angeles Department of City Planning

- **Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once, prior to issuance of the demolition, grading or building permit; Periodic field inspections during construction
- **Action Indicating Compliance:** Approval of Construction Traffic Management Plan by Los Angeles Department of Transportation prior to issuance of demolition, grading, or building permit (Pre-Construction); Compliance certification report submitted by Project contractor (Construction)

TRANS-PDF-2: Transportation Management Organization. The Applicant will provide its fair share of seed funding for the Arts District portion of a Downtown/Arts District Transportation Management Organization (TMO), following approval of the Project, by providing funding for TMO operations and marketing efforts. The Applicant will commit its fair share required in the first year to cover the cost of launching the Arts District portion of a Downtown/Arts District TMO and will continue to commit to nine additional years (10 years in total), as a charter member with annual dues.

- **Enforcement Agency:** Los Angeles Department of Transportation; Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-occupancy
- **Monitoring Frequency:** Once annually for ten years
- **Action Indicating Compliance:** Issuance of Certificate of Occupancy

TRANS-PDF-3: Transportation Demand Management (TDM) Program. The Project will develop and implement a Transportation Demand Management (TDM) program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The TDM program will be subject to review and approval by the City of Los Angeles Department of City Planning and Los Angeles Department of Transportation (LADOT). The TDM Program must be approved by LADOT prior to the issuance of the first Certificate of Occupancy. The strategies in the TDM program may include, but would not be limited to, the following:

- Educational Programs/On-Site TDM Coordinator – A TDM coordinator on the building management staff would reach out to employers and employees directly

to make them aware of the various programs offered and promote the benefits of the TDM.

- **Transportation Information Center/Kiosks** – A Transportation Information Center is a centrally-located commuter information center where Project employees and visitors can obtain information regarding commute programs, and individuals can obtain real-time information for planning travel without using an automobile. A Transportation Information Center will support orientation for new employees as well as providing information about transit schedules, commute planning, rideshare, telecommuting, and bicycle and pedestrian plans.
- **Bicycle and Pedestrian Amenities** – The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities and showers. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians.
- **City Bicycle Plan Trust Fund** – The Applicant would contribute to the City Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area under the 2010 Bicycle Plan and Mobility Plan.
- **Ridesharing Services Programs** – The TDM program would provide services to match employees together to establish carpools and vanpools.
- **Incentives for Using Alternative Travel Modes** – The TDM program may include, but would not be limited to, various incentives for use of its programs. For example, carpool and vanpool users could be offered preferential load/unload areas or convenient designated parking spaces. Unbundled parking is a program wherein parking spaces are rented separately from the building space, which allows for a separate charge for parking and the flexibility to vary the number of spaces rented.
- **Mobility Hub Support** – The Project would support existing and/or future efforts by LADOT to provide first-mile and last-mile service for transit users through the mobility hub program. Mobility hubs, typically located at or near public transit centers, would provide amenities such as, but not limited to, bicycle parking, and transit information. In cooperation with the proposed Downtown/Arts District Transportation Management Organization (TMO), the Project could provide space for similar amenities at the Project Site to complement future mobility hubs in the Study Area.
- **Enforcement Agency:** Los Angeles Department of Transportation; Los Angeles Department of City Planning

- **Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of City Planning
- **Monitoring Phase:** Post-Construction
- **Monitoring Frequency:** Once at Project plan check
- **Action Indicating Compliance:** TDM approval; Issuance of occupancy permit

h) Utilities and Service Systems – Water Supply and Infrastructure

(1) Project Design Features

WS-PDF-1: Water Conservation Features. The Project will provide the following water efficiency features:

- 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.
- Domestic Water Heating System located in close proximity to point(s) of use.
- Drip/Subsurface Irrigation (Micro-Irrigation)/Bubblers for trees.
- Proper Hydro-zoning/Zoned Irrigation.
- Drought Tolerant Plants.
- **Enforcement Agency:** Los Angeles Department of Water and Power; Los Angeles Department of Building and Safety; Los Angeles Department of City Planning
- **Monitoring Agency:** 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:** Project plan approval; Issuance of building permit; Issuance of Certificate of Occupancy