

IV. Modified Mitigation Monitoring Program

1. Introduction

To ensure that the mitigation measures identified in an Environmental Impact Report (EIR) are implemented, the California Environmental Quality Act (CEQA) requires the Lead Agency for a project to adopt a program for monitoring or reporting on the revisions it has required for a project and the measures it has imposed to mitigate or avoid significant environmental effects. As specifically set forth in CEQA Guidelines Section 15097(c), the public agency may choose whether its program will monitor mitigation, report on mitigation, or both. As provided in CEQA Guidelines Section 15097(c), “monitoring” is generally an ongoing or periodic process of project oversight. “Reporting” generally consists of a written compliance review that is presented to the decision-making body or authorized staff person.

An EIR has been prepared to address the Project’s potential environmental impacts. 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.

This MMP has been prepared in compliance with the requirements of CEQA Section 21081.6 and CEQA Guidelines Section 15097. The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

2. Purpose

It is the intent of this MMP to:

1. Verify compliance with the project design features and mitigation measures identified in the EIR;

2. Provide a framework to document implementation of the identified project design features and mitigation measures;
3. Provide a record of mitigation requirements;
4. Identify monitoring and enforcement agencies;
5. Establish and clarify administrative procedures for the clearance of project design features and mitigation measures;
6. Establish the frequency and duration of monitoring; and
7. Utilize the existing agency review processes wherever feasible.

3. Organization

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

- 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 required 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 agency and the appropriate enforcement agency that each project design feature and mitigation measures 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. Further,

specifically 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 Annual Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the mitigation measures and project design features 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

The project shall be in substantial conformance with the project design features and mitigation measures contained in this Mitigation Monitoring Program. 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 or mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, Sections 15162 and 15164, including by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the project design features or 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. Under this process, the modification or deletion of a project design feature or mitigation measure shall not require a modification to any project discretionary approval unless the Director of Planning also finds that the change to the project design features or mitigation measures 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

AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators will be used during construction.

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

(2) Mitigation Measures

Mitigation Measure AIR-MM-1: All off-road diesel-powered equipment ~~greater than 50 hp~~ used during Project ~~grading/excavation~~ construction activities shall meet United States Environmental Protection Agency (USEPA) Tier 4 Final emissions standards. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and California Air Resources Board (CARB) or South Coast Air Quality Management District (SCAQMD) operating permit shall be provided on-site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit.

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

Mitigation Measure AIR-MM-2: During the grading phase, all trucks hauling the export of soil material and demolished site improvements shall be model year 2007 or newer. Prior to issuance of a grading permit, the applicant shall provide evidence (such as copies of contracts with concrete subcontractors with specifications or engine certifications) satisfactory to the Department of City Planning demonstrating compliance with this measure.

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

Mitigation Measure AIR-MM-3: All construction equipment shall 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.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; South Coast Air Quality Management District
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodically during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection sign-off

Mitigation Measure AIR-MM-4: Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after five minutes when not in use, to reduce vehicle emissions.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Construction

- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); periodically during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection sign-off

Mitigation Measure AIR-MM-5: If stationary petroleum-powered construction equipment, such as generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses. Distance to the nearest receptor is measured from the exhaust stack of the engine to the nearest receptor location.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); periodically during construction
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection sign-offs

B. Cultural Resources

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

Mitigation Measure CUL-MM-1: Prior to the start of either demolition, grading, or construction, qualified principal archaeologist (Project Archaeologist) meeting the Secretary of the Interior's Qualification Standards for Archaeology shall be retained. The Project Archaeologist shall prepare a written Cultural Resources Monitoring and Treatment Plan (CRMTP) to reduce potential Project effects on unanticipated archaeological resources unearthed during construction through data recovery. The CRMTP shall be approved by the Department of City Planning, Office of Historic Resources. The CRMTP shall also include a summary of pertinent background information, consistent with the information disclosed in this EIR, including the environmental and cultural settings of the Project area, site information, and in the event of discovery of any archaeological resources, the proposed avoidance methods, reporting methods, and plans for curation of collected materials.

- **Enforcement Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction, construction
- **Monitoring Frequency:** Once at plan check (submittal of Cultural Resource Monitoring and Treatment Plan); Monitoring as determined by Qualified Archeologist
- **Action Indicating Compliance:** Submittal of Cultural Resource Monitoring and Treatment Plan prior to issuance of demolition or grading permit. Monitoring shall occur during grading and excavation activities; if unanticipated discoveries are found, submittal of compliance report by a qualified archeologist; Issuance of building permit(s)

Mitigation Measure CUL-MM-2: During project planning, demolition, excavation, and construction, the CRMTP shall be implemented by the Project Archaeologist. The CRMPT shall include the professional qualifications required of key staff, monitoring protocols, provisions for evaluating and treating sites discovered during ground-disturbing activities, and reporting requirements. The CRMTP shall also include a section describing the protocol in the event that human remains are discovered during Project construction consistent with the provisions of the California Health and Safety Code.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at plan check (submittal of Cultural Resource Monitoring and Treatment Plan); To be determined by consultation with archaeologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified archaeologist

Mitigation Measure CUL-MM-3: If cultural resources that may be eligible for listing in the California Register are discovered during demolition, excavation, or construction, all ground-disturbing activities in the immediate vicinity of the find shall be halted to allow the Project Archaeologist for up to 5 days to evaluate the find. If the find is recommended as eligible for the California Register by the Project Archaeologist, the Project proponent and City of Los Angeles Department of City Planning, Office of Historic

Resources, shall be notified and the provisions of the CRMPT shall be implemented to reduce Project impacts on the newly discovered resource to a less-than-significant level.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** To be determined by consultation with archaeologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified archaeologist; issuance of building permit(s)

C. Energy

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

D. Geology and Soils¹

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

Mitigation Measure GEO-MM-1: During the excavation and grading phases and prior to the issuance of building permits, the Applicant shall retain an

¹ *At the time the Initial Study was published, the Appendix G thresholds addressed paleontological resources under the Cultural Resources section and the paleontological mitigation measure was numbered "CUL-MM-1." Paleontological resources are now evaluated as part of Geology and Soils and the mitigation measure has been renamed accordingly.*

independent Construction Monitor, who shall be responsible for coordinating with a certified paleontologist to implement and enforce the following:

- a. If any paleontological materials are encountered during the course of Project development, the Construction Monitor shall coordinate with the services of a paleontologist, and all further development activity shall halt in the immediate vicinity of the find and the following shall be undertaken:
 - i. The services of a professional paleontologist shall then be secured by contacting the Center of Paleontology–USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum to assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
 - ii. The Construction Monitor shall also prepare and submit documentation of the Applicant’s compliance during construction every 30 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant’s Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the mitigation measure 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.
 - iii. The paleontologist’s survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
 - iv. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
- b. At the conclusion of monitoring activities, the Project paleontologist shall prepare a signed statement indicating the first and last dates monitoring activities took place, and submit it to the Dept. of City Planning, for retention in the administrative file for Case No. ENV-2017-1084-EIR.
- c. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum or when permitted by the Construction Monitor.
- d. Prior to the issuance of any certificate of occupancy, the Applicant shall submit a letter to the case file indicating what, if any,

paleontological reports have been submitted, or a statement indicating that no material was discovered.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** : Periodically during grading and excavation activities; to be determined by consultation with paleontologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified paleontologist

E. Greenhouse Gas Emissions

(1) Project Design Features

Project Design Feature GHG-PDF-1: The design of the new buildings shall incorporate the following sustainability features:

- Incorporate energy-saving technologies and components to reduce the Project's electrical use profile. Examples of these components include the use of light emitting diode (LED) and other efficient lighting technology, energy saving lighting control systems such as light- and motion-detection controls (where applicable), and energy efficient heating, ventilation, and air conditioning (HVAC) equipment.
- HVAC mechanical systems and building lighting will be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- Demand control ventilation will be utilized in HVAC systems, and refrigerants in HVAC equipment will have low GHG emission rates. In particular, the HVAC system will be designed to optimize exterior and interior air-flow to ensure healthy indoor air quality.
- Install occupancy-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption at residential and non-residential uses.
- Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
- Incorporate energy-efficient design methods and technologies which may include high performance window glazing, passive

design and façade shading devices, high efficiency domestic water heaters, and enhanced insulation to minimize solar heat gain.

- Built-in appliances, refrigerators, and space-conditioning equipment shall meet or exceed the minimum efficiency levels mandated in the California Code of Regulations. High-efficiency Energy Star-rated products and appliances will be installed, as available.
- Fenestration will be designed for solar orientation (i.e., window systems shall be designed to reduce thermal gain and loss), thus reducing cooling loads during warm weather and heating loads during cool weather.
- A large percentage of exterior walls will be finished with light colored materials and high-emissivity characteristics to reduce cooling loads.
- Use of water-efficient plantings with drought-tolerant species.
- Pedestrian- and bicycle-friendly design.
- Allocate preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.
- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

F. Land Use

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

G. Noise

(1) Project Design Features

Project Design Feature NOI-PDF-1: 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. The construction contractor will keep documentation on-site demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at plan check (provide proof of compliance); Periodically during construction
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection sign-off

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment will be enclosed or screened from off-site noise-sensitive receptors as defined in the LA CEQA Thresholds Guide.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction, construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once at field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; submittal of compliance report from noise consultant

Project Design Feature NOI-PDF-3: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 71 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems at the Ground Level (Outdoor Dining, Plaza, and Paseo) and 85 dBA (L_{eq-1hr}) at the Levels 2 and 3 (Courtyards at Buildings 1, 2, 3, and 4, and Paseo) and at the Recreation Building Roof Level Terrace. A qualified noise consultant will provide written documentation that the design of the system complies with these maximum noise levels.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Post-construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once at field inspection

Action Indicating Compliance: Plan check approval and issuance of applicable building permit; submittal of compliance report from noise consultant prior to Certificate of Occupancy

Project Design Feature NOI-PDF-4: All loading docks will be acoustically screened from off-site noise-sensitive receptors.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction, construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once at field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Project Design Feature NOI-PDF-5: Project construction will not include the use of driven (impact) pile systems.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); Periodically during construction

- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection sign-off

(2) Mitigation Measures

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the eastern property line of the Project Site between the construction areas and the residential uses on the east side of Serrano Avenue east of the Project Site (receptor R1). The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor R1.
- Along the northern property line of the Project Site between the construction areas and residential use on Serrano Avenue northeast of the Project Site (receptor R2) and the hotel on the north side Sunset Boulevard (receptor R3). The temporary sound barrier shall be designed to provide a minimum 11-dBA and 7-dBA noise reduction at the ground level of receptors R2 and R3, respectively.
- Along the southern property line (east portion) of the Project Site between the construction areas and residential use on Fernwood Avenue south of the Project Site (receptor R5). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor R5.
- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; submittal of compliance report from qualified noise consultant.

Mitigation Measure NOI-MM-2: Prior to start of construction, the Applicant shall retain the services of a structural engineer or qualified professional to perform a pre-construction survey of the multi-story office building on adjacent to the Project Site to the south to inspect and document the apparent physical condition of the buildings' readily-visible features.

The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and

implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at property line of the office building adjacent to the Project Site to the south during demolition and grading/excavation phases. The vibration monitoring system shall continuously measure and store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.4 PPV and a regulatory level of 0.5 PPV. The system shall also provide real-time alert when the vibration levels exceed the two preset levels.

In the event the warning level (0.4 PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.

In the event the regulatory level (0.5 PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged, and repairs will be provided in the event any damage occurred. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is recalibrated and construction activities are adjusted to be below the warning level.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once during field inspection
- **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; submittal of compliance report from noise consultant

H. Population and Housing

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

I.1. Public Services—Fire Protection

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

I.2. Public Services—Police Protection

(1) Project Design Features

Project Design Feature POL-PDF-1: Prior to construction, the Applicant will implement temporary security measures, including security barriers and fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. Regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided to minimize trespassing, vandalism, and short-cut and other attractions. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection sign-off

Project Design Feature POL-PDF-2: During operation, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. The Project's security will include, but not be limited to, the following design features:

- Installing and utilizing a 24-hour security camera network throughout the underground parking structures, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces. All security camera footage shall be maintained for at least 30 days, and such footage shall be provided to the LAPD, as needed;
- Maintaining staff on-site, including at the lobby concierge desk. Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed;
- Controlling access to all building elevators, residences, and resident-only common areas through an electronic key fob specific to each user;
- Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and patrolling the property; and
- Maintaining unrestricted access to commercial/restaurant uses during business hours, with public access (except for authorized persons) prohibited after the businesses have closed.
- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; post-construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once during field inspection
- **Action Indicating Compliance:** Plan check approval and submittal of compliance documentation by Applicant; issuance of Certificate of Occupancy

Project Design Feature POL-PDF-3: The Project will provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

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

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

Project Design Feature POL-PDF-4: The Project will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; post-construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Project Design Feature POL-PDF-5: The Project will design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; post-construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant will consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project, including applicable features in LAPD's Design Out Crime Guidelines.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); prior to the issuance of applicable building permit
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Project Design Feature POL-PDF-7: Upon completion of the Project and prior to the issuance of the building permit, the Applicant will submit a diagram of the Project Site to the LAPD's Hollywood Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); prior to the issuance of applicable building permit
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

I.3. Public Services—Schools

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

I.4. Public Services—Libraries

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

I.5. Public Services—Parks and Recreation

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

J. Transportation

(1) Project Design Features

Project Design Feature TR-PDF-1: The Project will prepare and implement a Transportation Demand Management (TDM) Program consistent with City policies on sustainability and smart growth and with LADOT's trip reduction and multi-modal transportation program. The TDM Program shall include the following measures:

- Unbundled Parking: Parking spaces for residents will be leased separately from dwelling units, thereby explicitly exposing residents to the cost of parking and giving them the option not to pay for parking. This measure is designed to reduce auto ownership and encourage the use of alternative modes of transportation;

- **Promotions & Marketing:** Prior to employment and residential leasing, employees and residents will be provided with materials and promotions encouraging use of alternative modes of transportation. Verification of material and promotions will be provided prior to approval of building permit. This type of campaign helps to raise awareness of the options available to people who may never consider any alternatives to driving.
- **Enforcement Agency:** City of Los Angeles Department of Transportation, City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at Project plan check prior to issuance of building permit (provide proof of compliance); once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Approval of TDM program from LADOT; issuance of Certificate of Occupancy; submittal of compliance documentation by Applicant

Project Design Feature TR-PDF-2: Prior to the start of construction, a detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared by the Applicant and submitted to the Los Angeles Department of Transportation (LADOT) for review and approval. The Construction Traffic Management Plan would formalize how construction would be carried out and identify specific actions that would 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:

- Advance, bilingual (English and Spanish) notification to adjacent property owners and occupants, and nearby schools, of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent residential streets.
- Temporary pedestrian and vehicular traffic controls during all construction activities adjacent to Sunset Boulevard, Western Avenue, and Serrano Avenue, to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian safety at the Project Site.

- 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.
- Construction-related vehicles/equipment shall not park on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate, including along all identified Los Angeles Unified School District 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 nearby school drop-off and pick-up activities.
- Coordination with Metro to address the relocation of the bus stop located at the southeast corner of Sunset Boulevard and Western Avenue adjacent to the Project Site.
- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check prior to issuance of grading or building permit (provide proof of compliance); once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of grading permit; field inspection sign-off

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

K. Tribal Cultural Resources

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

L.1. Utilities and Service Systems—Water Supply and Infrastructure

(1) Project Design Features

Project Design Feature WAT-PDF-1: In addition to regulatory requirements, the Project design shall incorporate the following design features to support water conservation in excess of LAMC requirements:

- Showerheads with a flow rate of 1.6 gpm or less.
- Non-residential lavatory faucets with a flow rate of 0.35 gpm or less.
- Metering faucets with a flow rate of 0.18 gallons per cycle, or less.
- High-efficiency toilets with a flush volume of 1.12 gallons per flush or less.
- Urinals with a flush volume of 0.11 gallons per flush or less.
- Leak detection system for swimming pools and Jacuzzi.
- Use of proper hydro-zoning/zoned irrigation (grouping plants with similar water requirements together).
- Drought-tolerant plants—45 percent of total landscaping.
- **Enforcement Agency:** City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check (provide proof of compliance); once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

L.2. Utilities and Service Systems—Wastewater

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.

L.3. Utilities and Service Systems—Energy Infrastructure

(1) Project Design Features

No project design features are identified in the Environmental Impact Report for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the Environmental Impact Report for this environmental issue.