IV. Mitigation Monitoring Program

IV. Mitigation Monitoring Program

1. Introduction

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

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

An 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. Organization

As shown on the following pages, each identified PDF and MM for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: The agency with the power to enforce the PDF or MM.

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

3. Administrative Procedures and Enforcement

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

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

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

4. Program Modification

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will

determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

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

5. Mitigation Monitoring Program

A. Air Quality

(1) Project Design Features

Project Design Feature 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

Project Design Feature AIR-PDF-2: All new emergency generators will meet the emission standards included in Table 1 of SCAQMD Rule 1470 and

USEPA Tier 4 Final standards. A childcare use, if any is proposed in the future, will be located a minimum of 330 feet from the existing Big Blue emergency generator to the extent it remains in use.

- **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

Project Design Feature AIR-PDF-3: The on-site speed limit for construction employee vehicles and delivery and haul trucks will be limited to 15 miles per hour on paved surfaces, 10 miles per hour on unpaved surfaces controlled by soil stabilizers, and 5 miles per hour near active work zones to position for loading/unloading. To further control dust emissions from the unpaved portion of on-site haul routes, 400 feet of surface area per haul (haul truck round trip) will be controlled by soil stabilizers and 200 feet of surface area per haul near the active import/export operation (excavation area) will be watered three times daily.

- **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: Prior to demolition, a Project representative shall make available to the City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all offroad construction equipment that will be used during any portion of construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology

documentation, and California Air Resources Board (CARB) or SCAQMD operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow a Construction Monitor to compare the onsite equipment with the inventory and certified Tier specification and operating permit. Offroad diesel-powered equipment within the construction inventory list described above shall meet the United States Environmental Protection Agency (USEPA) Tier 4 Final standards. In addition, where commercially available for the Project Site, construction equipment shall meet Tier V requirements.

To the extent commercially available for the Project Site, small electric (i.e., less than 19 kilowatts) off-road equipment shall be used during Project construction in lieu of conventional small gasoline or diesel off-road equipment. Electric pumps shall be used for temporary dewatering during Project construction.

- **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: The Project's truck operator(s)/construction contractor(s) shall commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/brake horsepower (bhp)-hr for particulate matter and 0.20 g/bhp-hr of nitrogen oxide emissions or newer, cleaner trucks for haul trucks associated with demolition and grading/excavation activities and concrete delivery trucks during concrete mat foundation pours. To monitor and ensure 2010 model year or newer trucks are used during Project construction, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities and make these records available to the Lead Agency during the construction process upon request. In addition, where commercially available for the Project Site, the Project's truck operator(s)/construction contractor(s) shall use 2014 model year or newer heavy-duty trucks meeting CARB's 2013 optional low-NOx standard (i.e., 0.02 g/bhp-hr of nitrogen oxide emissions).

- **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: Construction haul truck staging areas shall be located no closer to adjacent residential uses than depicted in Figure 1 of Appendix FEIR-8 of the Final EIR.

- **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); 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: All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

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

Mitigation Measure AIR-MM-5: To the extent commercially available for the Project Site, renewable diesel fuel shall be used in Project construction equipment in lieu of conventional diesel.

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

B. Cultural Resources

(1) Project Design Features

Project Design Feature CUL-PDF-1: Project Parameters—The following Project Parameters set forth the maximum permitted development footprint and building heights for new adjacent construction and additions to the Primary Studio Complex to ensure that the historic significance of the Primary Studio Complex is not adversely impacted by new construction. These Project Parameters will not limit the land uses or floor areas permitted under the proposed Specific Plan. Conceptual diagrams illustrating the Project Parameters set forth below are included in Section 9 of the Historical Resources Technical Report—TVC 2050 Project (Historic Report), provided in Appendix C of the Draft EIR.

Rehabilitation of the Primary Studio Complex and new construction adjacent to the Primary Studio Complex will comply with the following Project Parameters:

Rehabilitation of the Primary Studio Complex

- Preserve the existing character-defining features of the Primary Studio Complex, as detailed in designated Historic-Cultural Monument (HCM) No. 1167 (CHC-2018-476-HCM), and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project).[1]
- Remove the non-historic Support Building addition on the west side of the Studio Building, thereby restoring the original volume of the Studio Building, revealing the currently obstructed portions of the Studio Building's original west wall and restoring areas that have previously been removed.
- Remove up to two bays of the Studio Building's west wall to allow for an interior east-west passage through the Primary Studio Complex.

[1] The character-defining features of the Primary Studio Complex are set forth in the findings that were adopted as part of the HCM designation (CHC-2018-476-HCM), which is included in Appendix C of the Historic Report of the Draft EIR (Draft EIR Appendix C.1).

- Remove the non-historic Mill Addition constructed in 1969 on the east side of the Service Building.
- Retain and rehabilitate the three-story office portion of the Service Building and its steel frame and glass curtain walls on the primary (north) and east façades.
- Remove the portion of the Service Building south of the three-story office, much of which has been altered since 1963.
- Replace the portion of the Service Building south of the three-story office with new construction that partially restores the original volume of the Service Building.
- Remove and/or extend the south façade of the Studio Building by up to 20 feet south.
- Remove portions of the roof of the Studio Building above the interior east-west passage to create a partial open-air corridor.

Rooftop Addition above the Primary Studio Complex

- Design any rooftop addition as a single rectangular volume.
- Design any rooftop addition to be a separate and distinct volume rather than as an integrated extension of the Primary Studio Complex.
- Limit the height of any rooftop addition to 36 feet in height when measured from the top of the parapet of the Studio Building (approximately 84 feet above Project Grade) to the roof of the rooftop addition.
- Set back any rooftop addition a minimum of 55 feet from the north façade of the Studio Building.
- Engineer the structural support of any rooftop addition so that it could be removed without impairing the essential form and integrity of the Primary Studio Complex.

Adjacent New Buildings

- Locate new buildings immediately adjacent to the Primary Studio Complex to the east and south of the Service Building and to the west of the Studio Building.
- For any new construction immediately east of the Service Building that exceeds the height of the Service Building, any occupiable structure will be set back southerly from the north façade of the Service Building by a minimum of 60 feet and separated from the east façade of the Service Building by a minimum of 15 feet.
- For any new construction immediately west of the Studio Building that exceeds the height of the Service Building, any occupiable

structure will be set back southerly from the north façade of the Service Building by a minimum of 150 feet and separated from the west façade of the Studio Building by a minimum of 10 feet.

- Limit new construction on the west and east of the Primary Studio Complex to 225 feet in height above Project Grade.
- Design new construction to the west and east of the Primary Studio Complex as distinct volumes.
- Permit up to six open-air bridges at the interior floor levels (three on the east and three on the west) to provide pedestrian access to the Primary Studio Complex and any rooftop addition from the adjacent new buildings.
- **Enforcement Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during construction
- **Action Indicating Compliance:** Submittal of compliance documentation to City of Los Angeles Department of City Planning/ Office of Historic Resources and subsequent issuance of applicable building permit

Project Design Feature CUL-PDF-2: Historic Structure Report—The Applicant will prepare a Historic Structure Report (HSR) that will further document the history of the Primary Studio Complex and guide its rehabilitation in compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). The HSR will be completed prior to the development of the architectural and engineering plans for the Project. The HSR will be prepared based upon the National Park Service's Preservation Brief #43: The Preparation and Use of Historic Structure Reports. The HSR will thoroughly document and evaluate the existing conditions of the character-defining features of the Primary Studio Complex and make recommendations for their treatment. The HSR will also address changes to the buildings to suit new production techniques and modern amenities as well as their on-going maintenance after Project completion. The HSR will set forth the most appropriate approach to treatment and outline a scope of recommended work before the commencement of any construction. As such, the report will serve as an important guide for the rehabilitation of the Primary Studio Complex and will provide detailed information and instruction above and beyond

what is typically available prior to the rehabilitation of a historical resource.

- **Enforcement Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during construction
- **Action Indicating Compliance:** Submittal of compliance documentation to City of Los Angeles Department of City Planning/ Office of Historic Resources and subsequent issuance of applicable building permit

(2) Mitigation Measures

Mitigation Measure CUL-MM-1: Prior to the start of ground disturbance activities during Project construction, including demolition, digging, trenching, plowing, drilling, tunneling, grading, leveling, removing peat, clearing, augering, stripping topsoil or a similar activity (Ground Disturbance Activities), a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (Qualified Archaeologist) shall be retained by the Applicant to prepare a written Cultural Resource Monitoring and Treatment Plan (CRMTP) in accordance with the Secretary of the Interior's Standards for Archeological Documentation, to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction, with an emphasis on potential historical-period materials. The Applicant shall also coordinate with the Gabrieleño Band of Mission Indians—Kizh Nation who shall act in the capacity of the Tribal Consultant. A copy of the executed contract shall be submitted to the Department of City Planning prior to the issuance of any permit necessary for the Ground Disturbance Activities.

The CRMTP shall include the professional qualifications required of key staff, applicable regulatory requirements, monitoring protocols, provisions for evaluating and treating archaeological materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. Applicable regulations shall include but not be limited to Public Resources Code (PRC) Section 5024.1, Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The monitoring protocols shall include but not be limited to halting Ground Disturbance Activities

within at least a 25-foot radius in the event resources are discovered so that the significance can be determined. Treatment provisions shall include but not be limited to the following: statement of the preference for preservation in place (i.e., avoidance) per CEQA Guidelines Section 15126.4(b)(3); description of methods for the adequate recovery of scientifically consequential information; requirements to coordinate with the Tribal Consultant to ensure that consideration is given to the cultural values ascribed to a resource beyond that which is scientifically important in the event the resource is Native American in origin; and procedures for curating any archaeological materials at a public, non-profit curation facility, university or museum with a research interest in the materials. The CRMTP shall be approved by the Department of City Planning prior to commencement of any Ground Disturbance Activities.

Prior to commencing any Ground Disturbance Activities at the Project Site, the Applicant shall retain an archaeological monitor who is qualified to identify archaeological resources and shall work under the direction of the Qualified Archaeologist. The Tribal Consultant shall designate a Native American monitor who will work in tandem with the archaeological monitor to identify resources. If no Native American monitor is designated within 30 days, the activity shall commence without the designated Native American monitor.

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction workers involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction workers shall be informed about proper procedures to follow should a worker discover a cultural resource during Ground Disturbance Activities. In addition, construction workers shall be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing that the training was completed for all construction workers involved in Ground Disturbance Activities.

The Qualified Archaeologist shall coordinate the proper implementation of this mitigation measure during the demolition and excavation phases of the Project. The archaeological and Native American monitor shall observe all Ground Disturbance Activities until the Qualified Archaeologist and Tribal Consultant, in consultation with the archaeological and Native American monitors, determines monitoring is no longer necessary, as specified in the CRMTP. If Ground Disturbance Activities are occurring simultaneously at multiple locations on the Project Site, the Qualified Archaeologist shall

determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring.

Within 30 days of concluding the archaeological monitoring, the Qualified Archaeologist shall prepare a memo stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memo shall be submitted to the Applicant and the Department of City Planning. In the event that archaeological resources are identified, a full technical report shall be prepared documenting the methods and results of all work completed under the CRMTP, including, if any, treatment of archaeological materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the California Register of Historical Resources. The report shall be prepared under the supervision of the Qualified Archaeologist and submitted to the Department of City Planning within one year of completion of the monitoring, unless other arrangements are required given the nature of the discovery. The final report shall be submitted to the South Central Coastal Information Center.

- **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; Metro
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** To be determined by consultation with the Qualified 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. Geology and Soils

(1) Project Design Features

Project Design Feature GEO-PDF-1: All development activities conducted on the Project Site will incorporate the professional recommendations contained in the Preliminary Geotechnical Engineering Investigation and all associated Addenda and/or alternative recommendations set forth in a site-specific, design-level geologic and geotechnical investigation(s) approved by the City Engineer, provided such recommendations meet and/or surpass relevant state and City laws, ordinances, and Code requirements, including California Geological Survey's Special Publication 117A and the City's Building Code. Such

professional recommendations will include, but will not be limited to, the following and may be revised or superseded in accordance with an approved final geotechnical investigation(s):

- Excavated fill materials will be removed and exported or properly removed and recompacted as controlled fill for foundation and/or slab support of lightly loaded structures.
- Imported soil materials will have an Expansion Index of less than 50.
- At-grade structures with column loads less than 500 kips will be supported on conventional foundations bearing in an engineered fill pad.
- Foundation piles will be used for high-load office buildings and parking structures.
- Temporary dewatering will be utilized during construction.
- Permanent structures will be designed for hydrostatic pressure such that the temporary construction dewatering system will be terminated at the completion of construction.
- Temporary shoring, such as conventional shoring piles and tiebacks, will be installed for excavation of the subterranean 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:** 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

(2) Mitigation Measures

Mitigation Measure GEO-MM-1: The services of a Qualified Professional Paleontologist who meets the Society of Vertebrate Paleontology ([SVP] 2010) standards, shall be retained prior to ground disturbance activities associated with Project construction in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan. As defined by the SVP (2010), a Qualified Professional Paleontologist, also Principal Investigator, or Project Paleontologist, is described as:

A practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

1. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.
2. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
3. Proficiency in recognizing fossils in the field and determining their significance.
4. Expertise in local geology, stratigraphy, and biostratigraphy.
5. Experience collecting vertebrate fossils in the field."

The Paleontological Resource Mitigation and Treatment Plan shall specify the levels and types of mitigation efforts based on the types and depths of ground disturbance activities and the geologic and paleontological sensitivity of the Project Site. The Paleontological Resource Mitigation and Treatment Plan shall also include a description of the professional qualifications required of key staff, communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens. The Paleontological Resource Mitigation and Treatment Plan shall be reviewed by the curatorial staff of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County and/or the La Brea Tar Pits and Museum. The Draft Paleontological Resource Mitigation and Treatment Plan will be provided to the curatorial staff no later than four weeks before the start of excavation. A Worker Environmental Awareness Program, or WEAP, shall be conducted at the preconstruction meeting for the Project.

No monitoring would be required during excavation within artificial fill. This Qualified Professional Paleontologist shall supervise a Qualified Paleontological Resource Monitor who shall monitor all ground disturbance activities within high sensitivity deposits (e.g., Pleistocene age deposits), including asphaltic deposits in order to identify potential paleontological remains. As defined by the SVP (2010), a Qualified Paleontological Resource Monitor has the following qualifications (or their equivalent):

1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or
2. AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or
3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.
4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

In the event of a paleontological resource discovery, the monitor has the authority to divert and/or re-direct ground-disturbing activities in the area of the find, and rope off a protective barrier of at least 50 feet in length to evaluate the unanticipated find.

If significantly disturbed deposits or younger deposits too recent to contain paleontological resources are encountered during construction, the Qualified Professional Paleontologist may reduce or curtail monitoring in those affected areas, after consultation with the Applicant and the Los Angeles Department of City Planning's Office of Historic Resources.

Post-construction, a report shall be prepared detailing paleontological resources discovered during construction. The paleontological resources must be prepared, identified, curated, and donated to a repository, such as the Natural History Museum of Los Angeles County or the La Brea Tar Pits and Museum.

- **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 the Qualified Paleontologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a Qualified Paleontologist

D. Greenhouse Gas Emissions

(1) Project Design Features

Project Design Feature GHG-PDF-1: The design of new buildings will incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program to be capable of meeting the standards of LEED Gold under LEED v4 or equivalent green building standards. Specific sustainability features that are integrated into the Project design will include, but will not be limited to, the following:

a. 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;

b. Use of Energy Star–labeled appliances (e.g., refrigerators, air conditioners, and water heaters) consistent with California Code of Regulations (CCR) Title 20 (Appliance Efficiency Regulations);

c. Reduce indoor water use by at least 20 percent;

d. Plumbing fixtures (water closets and urinals) and fittings (faucets) that exceed Los Angeles Municipal Code (LAMC) performance requirements; and

e. Weather-based irrigation system and water-efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping.

- **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; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Project Design Feature GHG-PDF-2: Upon buildout of the Project, the Project will provide photovoltaic panels on the Project Site capable of generating a minimum of 2,000,000 kilowatt-hours annually.

- **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; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Project Design Feature GHG-PDF-3: The use of portable gasoline or diesel generators at basecamps or elsewhere on-site will be prohibited. Installation of a backbone electrical grid will be provided so that plugs (i.e., electrical hookups) are available at basecamp areas. In addition, four EV chargers will be installed for the four shuttle parking spaces in the Mobility Hub.

- **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; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Project Design Feature GHG-PDF-4: The use of portable combustion equipment (e.g., street sweeper, forklifts, aerial lifts) including landscape equipment will be prohibited on-site.

- **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; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

E. Hazards and Hazardous Materials

(1) Project Design Features

Project Design Feature HAZ-PDF-1: The Project Applicant will update, and the Project will comply with, the Consolidated Contingency Plan for the Project Site. This will include spill prevention measures such the use of secondary containment storage and storing materials away from drains in leak-proof containers with tight-fitting lids. Spill response measures will include the evacuation of unnecessary employees from a spill area, the use of absorbent materials in the case of small spills or evacuating all employees, calling 911, and reporting to Los Angeles Fire Department (LAFD) in the case of large spills. Absorbent materials used to clean small spills will be placed in a leak-proof container that is compatible with the waste, labeled as hazardous waste, and lawfully disposed of as such. Notifications will be made to the Health Hazardous Waste Materials Division of the LAFD and the California Office of Emergency Services (Cal OES) as necessary.

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

Project Design Feature HAZ-PDF-2: The Project Applicant will update, and the Project will comply with, the Television Studios Emergency Action Plan and associated emergency exit and assembly maps. The Emergency Action Plan will include procedures for earthquakes, emergency evacuation, fires, medical emergencies, and active shooters.

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

Project Design Feature HAZ-PDF-3: The Project Applicant will update, and the Project will comply with, the Television Studios Safety Manual. This manual will include, among other measures, safety procedures and requirements for personnel working at heights and procedures that ensure the safety of crew members when servicing or repairing equipment that is capable of a spontaneous release of stored mechanical, electrical, or hydraulic energy, or which could be inadvertently energized.

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

Project Design Feature HAZ-PDF-4: The Project Applicant will update, and the Project will comply with, the Television Studios Injury and Illness Prevention Program (IIPP). The IIPP will include protocols regarding responsibility, compliance, employee communication, hazard assessment, accident/exposure investigation, hazard correction, training and construction, and recordkeeping.

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

Project Design Feature HAZ-PDF-5: Prior to demolition, existing buildings and structures will be tested to determine if they include asbestos-containing materials (ACMs). If present, ACMs will be removed and disposed of by a licensed and certified asbestos abatement contractor, in accordance with applicable federal, state, and local regulations. If required, the Project Applicant will submit a Hazardous Building Materials Demolition Assessment and Management Plan to the South Coast Air Quality Management District (SCAQMD) and LAFD for review and approval.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; Los Angeles Fire Department; South Coast Air Management District
- **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 building permit; field inspection sign-off

Project Design Feature HAZ-PDF-6: Prior to demolition, existing buildings and structures will be sampled to determine if they contain lead-based paint (LBP). If LBP is present, standard handling and disposal practices will be implemented pursuant to Occupational Safety and Health Act regulations. If required, the Project Applicant will submit a Hazardous Building Materials Demolition Assessment and Management Plan to LAFD for review and approval.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; Los Angeles Fire Department
- **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 building permit; field inspection sign-off

(2) Mitigation Measures

Mitigation Measure HAZ-MM-1: Soil Management Plan (SMP)—The Project Applicant shall implement the SMP prepared by Geosyntec, provided as Appendix B of the Site Summary Report, which shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The entire Project Site shall be subject to the general protocols described in the SMP regarding prudent precautions and general observations and evaluations of soil conditions to be implemented throughout earthwork, grading, excavation, or other soil disturbance activities on the Project Site.

The protocols in the SMP include, but are not limited to, the following:

- Special precautions shall be taken to manage soils that will be disturbed during Project earthwork activities in areas containing Chemicals of Concern (COCs) above screening levels (SLs). These areas include the former Texaco gas station and other select areas of the Project Site with elevated total petroleum hydrocarbons (TPH) and arsenic in shallow soil, as shown in the Site Summary Report. Soil in these areas of the Project Site with residual COCs above SLs shall either be excavated prior to commencing excavation and grading operations in these areas or segregated and stockpiled prior to off-site disposal.
- The following requirements and precautionary actions shall be implemented when disturbing soil at the Project Site other than imported backfill: no soil disturbance or excavation activities shall occur without a Project Site-specific Health and Safety Plan (HASP). Any soil that is disturbed, excavated, or trenched due to onsite construction activities shall be handled in accordance with applicable local, state, and federal regulations. Prior to the re-use of the excavated soil or the disposal of any soil from the Project Site, the requirements and guidelines in the SMP shall be implemented. The General Contractor shall conduct, or have its designated subcontractor conduct, visual screening of soil during activities that include soil disturbance. If the General Contractor or subcontractor(s) encounter any soil that is stained or odorous (Suspect Soil), the General Contractor and subcontractor(s) shall immediately stop work and take measures to not further disturb the soils (e.g., cover suspect soil with plastic sheeting) and inform the property owner's representative and the environmental monitor. The environmental monitor, an experienced professional trained in the practice of the evaluation and screening of soil for potential impacts working under the direction of a licensed Geologist or Engineer, shall be identified by the property owner prior to the beginning of work.
  - If Suspect Soil is encountered on the Project Site, the environmental monitor shall collect samples for analysis to characterize the soil for potential on-site re-use or off-site disposal per the provisions provided in the SMP.
  - Prior to excavation activities, the General Contractor or designated subcontractor shall establish specific areas for stockpiling Suspect Soil, should it be encountered, to control contact by workers and dispersal into the environment, per the provisions provided in the SMP.
  - In the event of soil import to the Project Site, soil must be screened and evaluated in accordance with the Department of Toxic and Substance Control (DTSC) advisory regarding clean imported fill material. The General Contractor or designated

subcontractor shall require that the source of the imported soil provide documentation of such evaluation.

- The General Contractor shall ensure that on-site construction personnel comply with all applicable federal, state, and local regulations, as well as the State of California Construction Safety Orders (Title 8). Additionally, if Suspect Soil is expected to be encountered, personnel working in that area shall comply with California Occupational Safety and Health Administration regulations specified in CCR Title 8, Section 5192. The General Contractor shall prepare a Project-specific HASP. It is the responsibility of the General Contractor to review available information regarding Project Site conditions, including the SMP, and potential health and safety concerns in the planned area of work. The HASP should specify COC action levels for construction workers and appropriate levels of personal protective equipment (PPE), as well as monitoring criteria for increasing the level of PPE. The General Contractor and each subcontractor shall require its employees who may directly contact Suspect Soil to perform all activities in accordance with the General Contractor and subcontractor's HASP. If Suspect Soil is encountered, to minimize the exposure of other workers to potential contaminants on the Project Site, the General Contractor or designated subcontractor may erect temporary fencing around excavation areas with appropriate signage as necessary to restrict access and to warn unauthorized on-site personnel not to enter the fenced area. It is anticipated that all soil will be immediately loaded onto trucks for disposal and stockpiling on-site would not be necessary. If soil needs to be temporarily stored on-site, the stockpiled soil will be stored on the Project Site interior away from public interfaces on the perimeter.
- The General Contractor shall implement the following measures as provided in the SMP to protect human health and the environment during construction activities involving contact with soils at the Project Site: decontamination of construction and transportation equipment; dust control measures; storm water pollution controls and best management practices; and proper procedures for the handling, storage, sampling, transport and disposal of waste and debris.
- In the event volatile organic compound (VOC)-contaminated soil is encountered during excavation onsite, a South Coast Air Quality Management District (SCAQMD) Rule 1166 permit shall be obtained before resuming excavation. Rule 1166 defines VOC-contaminated soil as a soil which registers a concentration of 50 ppm or greater of VOCs as measured before suppression materials have been applied and at a distance of no more than

three inches from the surface of the excavated soil with an organic vapor analyzer calibrated with hexane. Either a SCAQMD Various Locations permit and plan, or a Project Site-specific permit and plan shall be required, depending upon the volume of soil to be excavated. Notifications, monitoring, and reporting related to the SCAQMD Rule 1166 permit shall be the responsibility of the General Contractor. If a Rule 1166 permit is required, an air monitoring plan may be required by the SCAQMD. Air monitoring plans are intended to protect the surrounding community from harmful exposure to VOCs and typically entail stationary monitoring stations for sample collection for laboratory analysis. Protection of onsite construction workers shall be accomplished by the development and implementation of the HASP.

- Known below-grade structures at the Project Site (i.e., storm water infrastructure) shall be removed from the ground or cleaned, backfilled, and left in place as appropriate during grading and excavation. If unknown below-grade structures are encountered during Project Site grading and excavation, the General Contractor shall promptly notify the property owner's representative the same day the structure is discovered. Based on an evaluation of the unknown below-grade structure by the appropriate professional (e.g., environmental monitor, geotechnical engineer), the property owner shall address the below-grade structure in accordance with applicable laws and regulations.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District; California Department of Toxic Substances Control
- **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 grading permit; field inspection sign-off

Mitigation Measure HAZ-MM-2: During construction activities at the Project Site, controls shall be in place to mitigate the effects of subsurface gases and impacted soil and groundwater on workers and the public. During construction, the following shall be implemented:

- Monitoring devices for methane and benzene shall be present to alert workers of elevated gas concentrations when basement or subsurface soil disturbing work is being performed;

- Contingency procedures shall be in place if elevated gas concentrations are detected such as the mandatory use of PPE, evacuating the area, and/or increasing ventilation within the immediate work area where the elevated concentrations are detected;
- Workers shall be trained to identify exposure symptoms and implement alarm response actions;
- Soil and groundwater exposed during excavations shall be minimized to reduce the surface area which could off-gas. This shall be achieved by staggering exposed excavation areas;
- Soil removed as part of construction shall be sampled and tested for off-site disposal in a timely manner. If soil is stockpiled prior to disposal, it shall be managed in accordance with the Project's Storm Water Pollution Prevention Plan (SWPPP);
- Fencing shall be erected to limit public access and allow for gas dilution; and
- A HASP shall be prepared to describe the proposed construction activities and hazards associated with each activity. Hazard mitigation shall be presented in the HASP to limit construction risks to workers. The HASP shall include emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory PPE requirements. The HASP shall be signed by all workers on-site to demonstrate their understanding of the construction risks.
- **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 during field inspection
- **Action Indicating Compliance:** Field inspection sign-off

F. 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 will be generated.

- Construction contractors will schedule construction activities to avoid the simultaneous operation of construction equipment within 100 feet of receptor location R1 (Broadcast Center Apartments) to minimize noise levels resulting from operating several pieces of high-noise-level emitting equipment such as drilling rigs, excavators, and concrete pumps.
- Construction equipment staging areas will be located at least 100 feet from receptor location R1. Contractors will place stationary noise sources on the Project Site at least 100 feet from receptor location R1.
- A telephone hot-line for use by the public will be established to report any adverse noise conditions associated with the construction of the Project. The hot-line telephone number shall be posted at the Project Site during construction in a manner visible to passersby with a minimum spacing of one sign for each 200 feet of the perimeter. In the event that the noise complaint is Project construction-related, the Applicant shall:
  - Document and respond to each noise complaint;
  - Conduct an investigation to attempt to determine the source of noise related to the complaint;
  - Take all reasonable measures to reduce the noise at its source; and
  - Submit a monthly summary report of the Project-related noise complaints to the City Planning Department or Building and Safety.
- Hydraulic tools will be used instead of pneumatic tools within 100 feet from receptor location R1, when commercially available.
- All impact tools will be shrouded or shielded within 100 feet from receptor location R1.
- Construction equipment will not be idled for extended periods of time (more than 5 minutes) within 100 feet of receptor location R1, as specified by CARB.
- Music (i.e., workers' radios) from the construction site will not be audible at off-site noise-sensitive receptors.
- Large 40-yard dumpsters will not be located within 200 feet from receptor location R1; or, if located within 200 feet of receptor location R1, a sound barrier blocking the line of sight to the dumpster from receptor location R1 will be required.

- Within 100 feet from any sensitive receptor location, the Project would utilize electric or battery powered construction equipment for the following pieces of equipment: tower cranes; mounted placing booms; scissor lifts; welding machines once permanent power is in place; swing stages; light towers for limited durations; concrete saw; and some light material forklifts (except for heavy material lifting) once concrete is in place.
- **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: 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

Project Design Feature NOI-PDF-3: Outdoor mounted mechanical equipment will be enclosed or screened by the building design (e.g., a roof parapet or mechanical screen) from the view of 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; submittal of compliance report from noise consultant prior to Certificate of Occupancy

Project Design Feature NOI-PDF-4: Outdoor amplified sound systems for outdoor gatherings (non-production uses) on roof decks, if any, will be designed so as not to exceed a maximum noise level of 85 A-weighted decibels (dBA) ($L_{eq\text{-}1hr}$) at a distance of 25 feet from the amplified speaker sound systems in any roof deck gathering areas located within 15 feet from the northern, southern and western property lines and within 40 feet from the eastern property line, and 95 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet from the amplified speaker sound systems within the interior portions of the Project Site[2] 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-5: Outdoor studio production activities will be prohibited within 200 feet of the Shared Eastern Property Line adjacent to the existing multi-family residence located immediately east of the Project Site (receptor location R1) between the hours of 10 P.M. and 7 A.M.

- **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

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[2] Based on the conceptual site plan shown in Section II, Project Description, of the Draft EIR, the potential roof decks along the perimeter were assumed to be at least 75 feet above adjacent grade and the roof decks within the interior portion of the Project Site were assumed to be at least 50 feet above grade.

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

(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 adjacent residential and park uses to the east, the temporary sound barrier shall be designed to provide a minimum 16-A-weighted decibels (dBA) noise reduction at the ground level of receptor locations R1 and R2. In addition, the temporary sound barrier along the Shared Eastern Property Line (between the Project Site and the Broadcast Center Apartments (R1)) shall be 30 feet high. The sound barriers shall be constructed when construction activities are located within 700 feet and 560 feet of receptor locations R1 and R2, respectively.
- Along the northern property line of the Project Site between the construction areas and the motel (receptor location R3) and school (receptor location R4) on the north side of Beverly Boulevard and the residential uses along Orange Grove Avenue, Ogden Drive, Genesee Avenue, and Spaulding Avenue (represented by receptor location R5), the temporary sound barrier shall be designed to break the line-of-sight and provide a minimum 9-dBA, 5-dBA and 8-dBA noise reduction at the ground level of receptor locations R3, R4, and R5 respectively. The sound barriers shall be constructed when construction activities are located within 280 feet, 300 feet, and 490 feet of receptor locations R3, R4 and R5, respectively.
- Along the western and a portion of the southern property lines of the Project Site between the construction areas and residential uses on Hayworth Avenue (receptor location R7) and the residential and motel uses on the west side Fairfax Avenue (receptor location R8), the temporary sound barrier shall be designed to break the line-of-sight and provide a minimum 15-dBA and 10-dBA noise reduction at the ground level of receptor locations R7 and R8, respectively. The sound barriers shall be constructed when construction activities are located within 700 feet and 340 feet of receptor locations R7 and R8, respectively.
- Along an approximately 250-foot segment of the southern portion of the Project property line between the construction areas and the Gilmore Adobe, a temporary sound barrier shall be designed to

break the line-of-sight and provide a minimum 15 dBA noise reduction at the ground level of the Gilmore Adobe.[3] The sound barrier shall be constructed when construction activities are located within 700 feet of the Gilmore Adobe.

- **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 noise consultant

G. Public Services—Police Protection

(1) Project Design Features

Project Design Feature POL-PDF-1: During Project construction, the Applicant will implement security measures including security fencing, low-level security lighting, locked entry, and security patrols.

- **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 24/7 security plan to ensure the safety of its employees and visitors.

[3] The Gilmore Adobe (also referred to as the Rancho La Brea Adobe) is a commercial use. A commercial use is not a sensitive receptor for purposes of the noise analysis under CEQA. Nonetheless, the Gilmore Adobe was treated hypothetically as a residential use for informational purposes in response to comments on the Draft EIR.

The Project's security plan will include, but will not be limited to, the following design features:

- Security fencing, walls, landscaping, and/or other elements to create a physical barrier at the Project Site perimeter;
- Points of entry will be secured by elements such as guard booths, key card passes, and pedestrian and vehicular access controls;
- A 24-hour security camera network to provide visual surveillance of outdoor areas, parking facilities, and other activity areas;
- Private on-site security staff, including at guard booths to control entry, and regular security patrols of the Project Site; and
- Appropriate staff training on security protocols, including site and building access control, managing and monitoring fire/life/safety systems, and patrolling the Project Site.
- **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 include appropriate lighting of buildings and walkways to provide for pedestrian orientation and to 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; 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; 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 include appropriate lighting of parking areas, elevators, and lobbies 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 design of the Project's entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways will 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 Los Angeles Police Department's (LAPD's) Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project.

- **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:** Pre-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 Project construction and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to LAPD's Wilshire 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:** Post-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

H. Transportation

(1) Project Design Features

Project Design Feature TR-PDF-1: A detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval prior to commencing construction. The Construction Traffic Management Plan will formalize how Project construction will be carried out and identify specific actions that will 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:

- The Project Applicant will designate a construction manager to serve as a liaison with the surrounding community and respond to any construction-related inquiries. Publicly visible signs will be posted at various locations with the liaison's contact information to

contact regarding dust complaints. The South Coast Air Quality Management District's phone number will also be included to ensure compliance with applicable regulations.

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets or in predominantly residentially zoned areas.
- Temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people trained in pedestrian and bicycle safety at the Project Site's driveways) during all construction activities adjacent to Fairfax Avenue, Beverly Boulevard, and The Grove Drive, to ensure traffic safety on the public right-of-way.
- Scheduling of construction-related activities to reduce the effect on traffic flow on surrounding major roadways.
- Containment of construction activity within the Project Site boundaries, to the extent feasible.
- Coordination with the Los Angeles Department of Transportation (LADOT) Parking Meter Division to address any potential loss of metered parking spaces.
- Implementing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.
- Rerouting construction trucks to reduce travel on congested streets.
- Provision of dedicated turn lanes for the movement of construction trucks and equipment on- and off-site, subject to LADOT approval.
- Prohibition of haul truck staging on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Maintenance of a log, available on the Project Site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities and posting of the telephone

number at the Project Site readily visible to any interested party during site preparation, grading, and construction.

- Obtaining the required permits for truck haul routes from the City prior to the issuance of any building permit for the Project.
- **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

Project Design Feature TR-PDF-2: The Project will implement a series of transportation demand management (TDM) measures that exceed the requirements established in the current TDM Ordinance. The TDM strategies will be implemented for the Project Site as a whole and will be available to both the existing and new employees on-site. The TDM Program will be subject to review and approval by the City, and the Project Applicant will record a Covenant and Agreement to ensure that the TDM Program will be maintained. The following TDM strategies will be implemented as proposed under the TDM Program:

- Educational Programs/On-Site Coordinator: A coordinator will reach out to employees directly to promote the benefits of TDM. The coordinator will provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities, rideshare/carpool/ vanpool programs, and parking incentives. Marketing activities, including printed/posted materials and digitally distributed information, will ensure that employees and visitors at the Project Site are aware of the benefits of the TDM Program and all of the mobility options available on-site and in the surrounding area.
- Transportation Information Center/Kiosks via Mobility Hub: The Project will install a transportation information center at a Mobility Hub. The transportation information center will provide employees and visitors with information regarding transit, commute programs, and non-vehicular travel planning. Informational digital bulletin boards and wayfinding information will be displayed along pedestrian paths to direct pedestrians to the Mobility Hub, nearby transit stops, bicycle parking, and bikeshare facilities.

- Bicycle Parking and Amenities: In order to facilitate bicycle use, the Project will provide short-term and long-term bicycle parking spaces in accordance with the Los Angeles Municipal Code (LAMC), as well as valet service, showers, lockers, and bicycle service areas and repair stands within the Project Site. The Project will incorporate features for bicyclists, such as exclusive access points and secured bicycle parking facilities. The Project Applicant will also contribute toward the implementation of bicycle improvements within the Study Area in accordance with the Mobility Plan.
- Pedestrian Amenities: The Project will incorporate features for pedestrians, such as landscape improvements, exclusive access points, and upgraded pedestrian facilities and bus stops. Additionally, the Project Site will be designed to be a safe, friendly, and convenient environment for pedestrians. The Project will provide more pedestrian-friendly sidewalks and areas along Fairfax Avenue, Beverly Boulevard, and The Grove Drive and maintain internal walkways throughout the Project Site. The Project Applicant will also contribute toward pedestrian facilities improvements as part of Vision Zero.
- Shuttle Service: The Applicant will either operate or fund van or shuttle service for employees and visitors between the proposed Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site. The shuttle will operate during typical commuter peak periods and provide service from or near the Project Site to the Metro D Line Wilshire/Fairfax Station. The shuttle service will enhance employee and visitor access to the Metro D (Purple) Line and, therefore, result in greater reductions in vehicle trips and vehicle miles traveled (VMT). Additionally, the Mobility Hub could support future shuttle services to connect to existing and future transit stations (e.g., the Metro B [Red] Line or Metro K [Crenshaw North] Line Extension).
- Ride-Share Matching and Carpool/Vanpool Program: The on-site TDM coordinator will provide ride-share matching services to match interested employees with similar commuters into carpools and vanpools.
- Neighborhood Enhancements: The Project will enhance the transportation mobility around the immediate Project Site area to encourage alternative transportation modes and connections to the Project Site from off-site locations. The Project will also enhance the existing crosswalks at the signalized intersections along Beverly Boulevard at Fairfax Avenue and Stanley Avenue/The

Grove Drive to current LADOT standards with new continental crosswalks and black and white contrast markings.[4]

- First-Mile/Last-Mile Options: In recent years, there has been a proliferation of new options for personal transportation that help to address first-mile/last-mile connectivity issues with public transit. These options include motorized scooters, skateboards, and bicycles, as well as human-powered bicycles. Some of these options involve personal ownership (various types of electric skateboards, bicycles, and scooters) and some are publicly available for short-term rentals (electric scooters, Metro Bike Share pedal-powered bicycles). These services are rapidly evolving and gaining widespread acceptance, and it is anticipated that by the time the Project is completed, the landscape for these services, as well as the regulatory issues surrounding some of them, may look substantially different. The Applicant is committed to forward-thinking in the design and implementation of the Project and will provide support for such services at the Mobility Hub, as appropriate. Specifically, as required by LADOT, the Mobility Hub will include space to accommodate support uses, storage, maintenance, and staging facilities. These services will give employees and visitors a variety of travel mode choices and, therefore, encourage the use of non-automobile modes to and from the Project Site and reduce VMT.
- Carpool/Vanpool Parking and Loading via Mobility Hub: The Mobility Hub will provide safe and convenient passenger loading areas for employee carpools/vanpools along with access to the Project Site's internal roadway network to get to the parking structures. Additional passenger loading areas are also proposed on Fairfax Avenue, Beverly Boulevard, and the Southern Shared Access Drive for carpools, vanpools, shuttles, ride-share, taxi, and other commercial and non-commercial vehicles. Bus or shuttle loading and unloading would not occur within 75 feet of the Broadcast Center Apartments without a noise barrier in place.
- Guaranteed Ride Home Program: A Guaranteed Ride Home program assures that transportation service will be provided to individuals who commute without their personal automobiles. This program overcomes one of the primary concerns of those who may choose alternative modes of transportation, which is how to get home or to a child's school in the case of an emergency. In the event of personal or family emergencies, the individual will be

[4] While LADOT recommended in their Assessment Letter for the Transportation Assessment (Draft EIR Appendix M.2) to improve the visibility of crosswalks, all crosswalks adjacent to the Project Site have since been improved with continental crosswalks.

reimbursed for a taxi ride, ride-share ride, or short-term car rental. This program will cover all employees participating in the carpool/vanpool program or using transit to and from the Project Site. A support service, such as Guaranteed Ride Home, is an important part of TDM implementation that assures an individual will not be dependent on a carpool or transit schedule in the event of an emergency.

- Transit Infrastructure Improvements: The Project will improve the existing transit infrastructure at bus stops located within the immediate vicinity of the Project Site along Fairfax Avenue and Beverly Boulevard. This will include, where applicable, upgrades to provide adequate benches, shelters, lighting, light-emitting diode (LED) displays, and signage.
- **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:** Post-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-3: The Project will include the following off-site Vision Zero safety improvements:[5]

- Where applicable, the Project will improve the existing pedestrian infrastructure at the bus stops located around the Project Site perimeter along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles' current bus shelter contract.
- The Project Applicant will contribute toward the funding of pedestrian facilities and safety improvements within the Study Area, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue.

[5] While LADOT recommended in their Assessment Letter for the Transportation Assessment (Draft EIR Appendix M.2) to improve the visibility of crosswalks, all crosswalks adjacent to the Project Site have since been improved with continental crosswalks.

- **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:** Post-construction
- **Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy for the appropriate development phase according to the Transportation Improvement Program Schedule in the Transportation Assessment
- **Action Indicating Compliance:** Issuance of Certificate of Occupancy for the appropriate development phase according to the Transportation Improvement Program Schedule in the Transportation Assessment

Project Design Feature TR-PDF-4: The Project Applicant will contribute $1.34 million toward transportation systems management (TSM) improvements within the Project area that may be considered to better accommodate intersection operations and increase network capacity throughout the Study Area. LADOT's Automated Traffic Surveillance and Control (ATSAC) Section has identified the following improvements within the Project area along Fairfax Avenue, Beverly Boulevard, and The Grove Drive:

- Fairfax Avenue and Beverly Boulevard—Signal upgrades, 351 cabinet with new signal controller, system loop, flashing yellow arrow at Beverly Boulevard for the westbound left-turn.
- Fairfax Avenue and Oakwood Avenue—Northbound and southbound system loops.
- Fairfax Ave and 3rd Street—Signal upgrades, new cabinet, flashing yellow arrow for eastbound and westbound left turn.
- The Grove Drive and 3rd Street—New signal controller for leading pedestrian interval.
- The Grove Drive and Beverly Boulevard—Closed Circuit TV (CCTV) camera, new cabinet and signal controller for leading pedestrian interval.
- The Grove Drive Corridor—Signal communication including conduit, 25 pair interconnect, 24SM single mode fiber, pull boxes, and ground cables.
- Beverly Boulevard and Genesee Avenue—System loops for eastbound and westbound, and new cabinet and westbound left turn phasing (if warranted).
- Beverly Boulevard and Gardner Street—System loops for eastbound and westbound.

- Beverly Boulevard and Curson Avenue—System loops for eastbound and westbound.
- **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 prior to issuance of applicable Certificate of Occupancy for the earliest of the three Project features identified in the Transportation Improvement Program Schedule in the Transportation Assessment
- **Action Indicating Compliance:** Written verification of payment of fees to the City of Los Angeles Department of Transportation or implementation of TSM improvements; issuance of Certificate of Occupancy for the earliest of the three Project features identified in the Transportation Improvement Program Schedule in the Transportation Assessment

Project Design Feature TR-PDF-5: The Project will install left-turn signal phases at the following three key intersections: Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street.

- **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 prior to issuance of Certificate of Occupancy for the appropriate development phase according to the Transportation Improvement Program Schedule in the Transportation Assessment
- **Action Indicating Compliance:** Issuance of Certificate of Occupancy for the appropriate development phase according to the Transportation Improvement Program Schedule in the Transportation Assessment

I. Utilities and Service Systems—Water Supply and Infrastructure

(1) Project Design Features

Project Design Feature WAT-PDF-1: In addition to any existing applicable regulatory requirements, the Project design will incorporate the following water conservation features to support water conservation:

- 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.
- ENERGY STAR Certified Residential Dishwashers—standard with 3.0 gallons/cycle or less.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- **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