

MITIGATION MONITORING PROGRAM

A. INTRODUCTION

This Mitigation Monitoring Program (MMP), which is provided below, has been prepared pursuant to Public Resources Code Section 21081.6 which requires adoption of a MMP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. The City of Los Angeles is the Lead Agency for the proposed Mitigated Negative Declaration (MND) prepared for the 1151 N. Las Palmas Avenue Project (the Project). The City is responsible for administering and implementing the MMP. The primary purpose of the MMP is to ensure that the mitigation measures identified in the MND are implemented, thereby minimizing identified environmental effects. The MMP also includes the proposed Project Design Features (PDFs). The PDFs are specific design elements proposed by the Applicant that have been incorporated into the Project to prevent the occurrence of or to minimize the significance of potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures, as defined by Section 15126.4 of the State CEQA Guidelines (Title 14 of the California Code of Regulations). However, PDFs are included in this MMP to ensure their implementation as a part of the Project.

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each project design feature and mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each project design feature and mitigation measures has been implemented. The Applicant shall maintain records demonstrating compliance with each project design feature and mitigation measure. Such records shall be made available to the City upon request. Further, specifically during the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Annual Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the mitigation measures and project design features within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

As shown on the following pages, each required mitigation measure and proposed PDF for the Project is listed and categorized by impact area, with an accompanying identification of the following:

- **Enforcement Agency:** The agency with the power to enforce the Mitigation Measure/Project Design Feature.
- **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 Mitigation Measure/Project Design Feature shall be monitored.
- **Monitoring Frequency:** The frequency at which the Mitigation Measure/Project Design Feature shall be monitored.
- **Action Indicating Compliance:** The action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure/Project Design Feature has been implemented.

B. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

Aesthetics/Visual Resources

Project Design Features

No project design features are required for Aesthetics/Visual Resources

Mitigation Measures

No mitigation measures are required for Aesthetics/Visual Resources.

Agricultural and Forest Resources

Project Design Features

No Project Design Features are required for Agricultural and Forest Resources.

Mitigation Measures

No mitigation measures are required for Agricultural and Forest Resources.

Air Quality

PDF AQ-1

Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 90 horsepower would meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or

model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City at the time of mobilization of each applicable unit of equipment.

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

Monitoring Phase: Pre-Construction; Construction

Monitoring Frequency: Periodic field inspections during construction

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor

PDF AQ-2: Off-Road Forklifts. All forklifts would be non-diesel forklifts. This requirement will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.

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

Monitoring Phase: Pre-Construction; Construction

Monitoring Frequency: Periodic field inspections during construction.

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor.

Mitigation Measures

No mitigation measures are required for Air Quality.

Biological Resources

Project Design Features

No Project Design Features are proposed for Biological Resources.

Mitigation Measures

No mitigation measures are required for Biological Resources.

Cultural Resources

Project Design Features

No Project Design Features are proposed for Cultural Resources.

Mitigation Measures

Mitigation Measure-CUL-1: All construction personnel shall be trained regarding the recognition of cultural resources and protection of all cultural resources. This training shall take place before the initiation of ground-disturbing activities. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural resources, general cultural items, including the prehistoric and historic use of the area, as well as pictures of typical cultural resources that can be found during construction. This training should stress applicable state, federal, and local laws, and include information on what to do in case an unanticipated discovery is made by a worker. All construction personnel should be instructed to stop work within a 100-foot radius of the find and immediately inform their field supervisor upon any discovery in the Project Area.

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

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to issuance of building permits for program approval.

Action Indicating Compliance: If applicable, report submitted by qualified archaeologist.

Energy

Project Design Features

No Project Design Features are proposed for Energy.

Mitigation Measures

No Mitigation Measures are proposed for Energy.

Geology and Soils

Project Design Features

No Project Design Features are proposed for Geology and Soils.

Mitigation Measures

Mitigation Measure GEO-1: Full-time paleontological monitoring during ground-disturbing activities within the late Pleistocene-age elevated and dissected alluvium (Qae). A Paleontological Monitor is a paleontologist who has a minimum of a bachelor's or equivalent degree in geology or paleontology and no less than one year of experience performing paleontological monitoring and salvaging fossil materials in the relevant geologic province; or an equivalent degree in biology or pursuit of a degree in geology or paleontology and no less than two years of comparable experience

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

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction, Construction

Monitoring Frequency: Once prior to issuance of building permits for program approval; Periodic during excavation.

Action Indicating Compliance: Issuance of grading permit and final monitoring and mitigation report submitted by qualified paleontologist.

Mitigation Measure GEO-2: If a probable paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Paleontologist has been retained to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor. If cleared by the Qualified Paleontologist, Ground Disturbance

Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by the Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards and maintained for a minimum of five years after the Certificate of Occupancy is issued. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.

A Qualified Paleontologist is a paleontologist who meets the Society of Vertebrate Paleontology standards for a Principal Investigator or Project Paleontologist; has demonstrated competence in field techniques, preparation, identification, curation, and reporting and/or a graduate degree in paleontology or geology or a publication record in peer reviewed journals; at least two years professional experience with administration and project management experience; proficiency in recognizing fossils in the field and determining their significance; expertise in local geology, stratigraphy, and biostratigraphy; and experience collecting vertebrate fossils in the field."

- Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- Monitoring Agency:** Los Angeles Department of Building and Safety
- Monitoring Phase:** Pre-construction, Construction
- Monitoring Frequency:** Once prior to issuance of building permits for program approval; Periodic during excavation
- Action Indicating Compliance:** Issuance of grading permit and development of Inadvertent Discovery Plan and if applicable, fossil collection and curation report submitted by qualified paleontologist.

Mitigation Measure GEO-3: Any recovered fossil remains will be prepared and identified to the lowest taxonomic level possible by knowledgeable paleontologists. Significant remains then will be transferred to a fossil repository for curation.

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

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction, Construction

Monitoring Frequency: Once prior to issuance of building permits for program approval; Periodic during excavation

Action Indicating Compliance: If applicable, report submitted by qualified paleontologist.

Mitigation Measure GEO-4: A qualified paleontologist shall prepare a report of findings made during all site grading activity with an appended itemized list of fossil specimens recovered during grading (if any).

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

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction, Construction

Monitoring Frequency: Once prior to issuance of building permits for program approval; Periodic during excavation

Action Indicating Compliance: Report of findings submitted by qualified paleontologist.

Mitigation Measure GEO-5: Prior to the start of any ground-disturbing activities, a preconstruction meeting shall take place during which the qualified paleontologist shall provide all construction personnel with paleontological sensitivity training via a Worker Environmental Awareness Program (WEAP). This training program will provide information regarding the potential to encounter subsurface paleontological resources during installation of Auger Pressure Grouted Displacement (AGPD) piles and the need to protect such resources. The training will inform construction personnel of the location(s) and boundaries of any areas with a high paleontological resource potential. Instruction will be provided as to the appropriate procedures

and notifications to be undergone should paleontological resources be discovered during Project construction. The training will also emphasize that unauthorized collections or disturbances of protected fossils on or off the Project area are prohibited and may result in criminal penalties and fines. The qualified paleontologist or qualified paleontological monitor may attend tailgate meetings to brief the construction crew on paleontological monitoring protocols.

- Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- Monitoring Agency:** Los Angeles Department of Building and Safety
- Monitoring Phase:** Pre-construction
- Monitoring Frequency:** Once prior to issuance of building permits for program approval.
- Action Indicating Compliance:** If applicable, report submitted by qualified paleontologist.

Greenhouse Gas Emissions

Project Design Features

- PDF GHG-1:** The Project would be an all-electric development that would not require new connections to natural gas.
- Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- Monitoring Agency:** Los Angeles Department of Building and Safety
- Monitoring Phase:** Pre-construction
- Monitoring Frequency:** Once prior to issuance of building permits.
- Action Indicating Compliance:** Field inspection survey.

Mitigation Measures

No Mitigation Measures are proposed for Greenhouse Gas Emissions.

Hazards and Hazardous Materials

Project Design Features

No Project Design Features are proposed for Hazards and Hazardous Materials.

Mitigation Measures

No mitigation measures are required for Hazards and Hazardous Materials.

Hydrology and Water Quality

Project Design Features

No Project Design Features are proposed for Hydrology and Water Quality.

Mitigation Measures

No mitigation measures are required for Hydrology and Water Quality.

Land Use and Planning

Project Design Features

No Project Design Features are proposed for Land Use.

Mitigation Measures

No mitigation measures are required for Land Use.

Mineral Resources

Project Design Features

No Project Design Features are proposed for Mineral Resources.

Mitigation Measures

No mitigation measures are required for Mineral Resources

Noise and Vibration

Project Design Features

PDF NOISE-1: Amplified Sound Systems. Amplified sound systems would not be installed or used at any of the outdoor spaces

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspections during construction.

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor.

Mitigation Measures

No mitigation measures are required for Noise and Vibration.

Population and Housing

Project Design Features

No Project Design Features are proposed for Population and Housing.

Mitigation Measures

No mitigation measures are required for Population and Housing.

Public Services

Project Design Features

PDF-PS-1: A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspections during construction.

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor.

PDF-PS-2: Prior to the occupancy of the Project, the Applicant shall provide Hollywood Community Police Station with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

Enforcement Agency: Los Angeles Police Department

Monitoring Agency: Los Angeles Police Department

Monitoring Phase: Construction

Monitoring Frequency: Once, prior to certificate of occupancy.

Action Indicating Compliance: Sign-off on LAPD reviewed diagrams; Certificate of Occupancy.

Mitigation Measures

No mitigation measures are required for Public Services

Parks and Recreation

Project Design Features

No Project Design Features are proposed for Parks and Recreation.

Mitigation Measures

No mitigation measures are required for Parks and Recreation.

Transportation

Project Design Features

PDF TRAF-1: Promotions and Marketing:

The Project would provide marketing and promotional tools to educate and inform employees about site specific transportation options and effects of their travel choices and opportunities to alter their habits through the office employers. It is assumed that 100 percent of employees would be eligible to be involved with a promotions and marketing program, allowing for the full 4% VMT reduction.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Annual

Monitoring Frequency: Certificate of Occupancy

PDF TRAF-2 Reduced Parking Supply:

Pursuant to City Ordinance No. 185,480 (Bicycle Parking Ordinance), new or existing code-required vehicle parking spaces for all uses may be replaced by bicycle parking at a ratio of one vehicle space for every four bicycle spaces. Based on LAMC, the project would typically require 219 vehicle parking

spaces. Per City Ordinance No. 185, the project would provide 213 vehicle parking spaces, six (6) fewer than the LAMC requirement.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Once, prior to certificate of occupancy.

Monitoring Frequency: Certificate of Occupancy.

PDF TRAF-3 Bicycle Parking and Amenities:

The project would provide 26 short-and long-term bicycle parking spaces, (i.e., 26 bicycle parking spaces consisting of 9 short-term and 17 long-term spaces), and amenities such as shower/changing facilities.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: A Once, prior to certificate of occupancy.

Monitoring Frequency: Certificate of Occupancy.

PDF TRAF-4: Construction Management Plan

The contractor would develop Construction Management Plan as part of the Project and submit it to the City of Los Angeles for approval to reduce the Project’s potential construction impacts. The Construction Management Plan would include the following:

- Coordinate with the City to ensure adequate access to the Project Site and land uses in proximity of the Project site is maintained.
- Pick-ups and deliveries of construction materials should be scheduled off-peak hours to the extent possible.
- Reduce the potential of trucks waiting for extended periods to load or unload.
- Construction truck contractor should provide off-site staging in a legal area.
- Determine the number and location of flag men required during traffic rerouting and deliveries.
- Contractor to post construction notices/hotlines at several locations on the Project Site.

- Establish requirements for storage of materials and loading/unloading on the Project Site.
- Worksite traffic control plans approved by the City of Los Angeles should be implemented to route vehicles, bicyclist, and pedestrians around the area during any parking, travel lane or sidewalk closures.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once prior to issuance of Building Permit; Periodic field inspections during construction

Action Indicating Compliance:

Approval of Construction Traffic Management Plan from the Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

Mitigation Measures

MM TRAF-1 Rideshare Program:

The Project would provide either designated parking spaces and loading zones for ridesharing vehicles and/or an internal website or program to coordinate rides. The rideshare program would be implemented through the office employers. It is assumed that 100 percent of employees would be eligible to be involved with a ridesharing program, allowing for the full 15% VMT reduction.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Annual

Monitoring Frequency: Certificate of Occupancy

Tribal Cultural Resources

Project Design Features

No project design features are required for Tribal Cultural Resources

Mitigation Measures

No mitigation measures are required for Tribal Cultural Resources

Utilities and Service Systems

Project Design Features

No project design features are required for Utilities and Service Systems

Mitigation Measures

No mitigation measures are required for Utilities and Service Systems

Wildfire

Project Design Features

No project design features are required for Wildfire.

Mitigation Measures

No mitigation measures are required for Wildfire.

In addition, the following Regulatory Compliance Measures are incorporated into the Project to avoid significant environmental effects:

Regulatory Compliance Measures

Biological Resources

RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site.

RCM-BIO-2: Proposed Project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding bird season

which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

If Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the Project.

Cultural Resources

RCM-CR-1. In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section to PRC Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be

unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

RCM-CR-2 In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033
323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
(323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.