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## MITIGATION MONITORING AND REPORTING PROGRAM

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### INTRODUCTION

Assembly Bill 3180 (AB 3180) codified in Section 21081.6 of the California Public Resources Code, became effective January 1, 1989, and requires a lead or responsible agency to adopt a mitigation monitoring and reporting program (MMRP) when approving or carrying out a project. The purpose of this program is to ensure that when an environmental document, either an environmental impact report (EIR) or a mitigated negative declaration, identifies measures to reduce potential adverse environmental impacts to less-than-significant levels that those measures are implemented as detailed in the environmental document. As lead agency for the Lopez Canyon Equestrian Trails and Trailhead Project (Project), and pursuant to AB 3180, the City of Los Angeles, LA Sanitation (LASAN)<sup>1</sup> is responsible for implementation of this MMRP.

As such, this MMRP is required to ensure that adopted mitigation measures are successfully implemented and a monitoring strategy was prepared for each mitigation measure identified in the Project. Once LASAN adopts the MMRP, the mitigation monitoring/reporting requirements will be incorporated into the appropriate permits (i.e., engineering specifications, engineering construction permits, real estate entitlements, etc.). Therefore, in accordance with the aforementioned requirements, this document lists each mitigation measure, describes the methods for implementation and verification, and identifies the responsible party or parties as detailed below in the MMRP Implementation section.

### MONITORING AND REPORTING PROCEDURES

This MMRP for the proposed Project will be in place through all phases of the Project, including design, construction, and operation, and will help ensure that project objectives are achieved. LASAN will be responsible for administering the MMRP and ensuring that all parties comply with its provisions. LASAN may delegate implementation and monitoring activities to staff, consultants, or contractors. All construction contractors shall submit an environmental compliance plan for construction management and LASAN approval prior to beginning construction activities. This plan shall document how the contractor intends to comply with all measures applicable to the contract, including application of best management practices (BMPs) in accordance with instructions listed in the construction specifications. LASAN also will ensure that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to rectify problems.

### MITIGATION MONITORING AND REPORTING PROGRAM IMPLEMENTATION

Pursuant to AB 3180, this MMRP was prepared and used to verify compliance with individual mitigation measures. This MMRP identifies each mitigation measure by discipline, the entity (organization) responsible for its implementation, and the report/permit/certification required for each measure, as shown in Table 1. Certain inspections and reports may require preparation by qualified individuals, and these are specified as needed. The timing and method of verification for each measure are also specified.

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<sup>1</sup> In addition to its role as the CEQA Lead Agency, LASAN will retain the contractor responsibilities as prescribed in this MMRP.



**Table 1. Mitigation Monitoring and Reporting Program for the Lopez Canyon Equestrian Trails and Trailhead Project**

Mitigation Measure	Timing and Methods	Responsible Parties
<b>Biological Resources</b>		
<p><b>BIO-1: Designate a Qualified Biologist.</b>            Prior to commencement of construction activities, LASAN shall designate a qualified project biologist who shall be responsible for overseeing compliance with protective measures for biological resources during clearing and work activities within and adjacent to areas of native habitat. The project biologist shall be familiar with the local habitats, plants, and wildlife and shall maintain communications with the contractor to ensure that issues relating to biological resources are appropriately and lawfully managed. The project biologist shall review final plans, designate areas that need temporary fencing, and monitor construction. The biologist shall monitor activities within designated areas during critical times such as vegetation removal, the installation of Best Management Practices (BMPs) and fencing to protect native species, and ensure that all avoidance and minimization measures are properly constructed and followed. The project biologist shall conduct a training session for all construction personnel and biological monitors. At minimum, the training shall include: (1) a description of sensitive biological resources, including sensitive communities, plant species, and wildlife species; (2) avoidance measures being implemented for sensitive biological resources; and (3) identification of the boundaries of permitted access and work areas.</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> LASAN will arrange for a qualified biologist to support pre-construction and construction activities</p>	<p><b>Implementation:</b> LASAN  <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>
<p><b>BIO-2: Worker Awareness Training Program.</b>            Project personnel and contractors that will be on-site during construction of the trail improvements shall complete environmental worker awareness training conducted by the project biologist. The training shall advise workers of potential impacts to sensitive habitat and sensitive species and the potential penalties for impacts to such habitat and species. At a minimum, the program shall include the following topics: occurrences of the sensitive</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> LASAN will arrange for a qualified biologist to create and conduct a training program for construction personnel.</p>	<p><b>Implementation:</b> LASAN  <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>



<p>species and sensitive vegetation communities in the area, a physical description and their general ecology, sensitivity of the species to human activities, legal protection afforded these species, penalties for violations of Federal and State laws, reporting requirements, and work features designed to reduce the impacts to these species.</p> <p>Included in this program shall be color photos of the sensitive species, which shall be shown to the employees. Following the education program, the photos shall be posted in the contractor and resident engineer's office, where they shall remain through the duration of the work. Photos of the habitat in which sensitive species are found shall also be posted on-site. The contractor shall be required to provide LASAN with evidence of the employee training (e.g., sign-in sheet or stickers) upon request. Employees and contractors shall be instructed to immediately notify the project biologist of any incidents, such as construction vehicles that move outside of the work area boundary. The project biologist shall be responsible for notifying the appropriate regulatory agency within 72 hours of any similar incident.</p>		
<p><b>BIO-3: Management of Invasive Weeds.</b> The project biologist shall monitor the project site immediately prior to and during construction to identify the presence of invasive weeds (those identified by the California Invasive Plant Council [Cal-IPC] as having a moderate or high level of invasiveness or plants considered locally invasive) and recommend measures to avoid their inadvertent spread in association with the project. Such measures may include inspection and cleaning of construction equipment and use of eradication strategies. All heavy equipment shall be washed and cleaned of debris prior to entering sensitive habitat areas to minimize the spread of invasive weeds.</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> LASAN will provide a qualified biologist to monitor during construction activity. The qualified biologist will recommend measures to avoid the spread of invasive weeds.</p>	<p><b>Implementation:</b> LASAN <b>Monitoring and Reporting:</b> LASAN</p>
<p><b>BIO-4: Establish Project Limits.</b> All native or sensitive habitat areas outside and adjacent to the project limits shall be designated as Environmentally Sensitive Areas (ESAs) on project maps. Prior to construction, the Contractor (LASAN) shall delineate the construction area and erect</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> LASAN will provide accurate project limits for the</p>	<p><b>Implementation:</b> LASAN <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>



<p>construction fencing along the perimeter of the identified construction area to protect adjacent sensitive habitats and sensitive plant populations. ESAs shall be temporarily fenced by the Contractor during construction with orange plastic snow fence, orange silt fencing, or, in areas of flowing water, with stakes and flagging. This fencing shall be marked clearly in the field and confirmed by the project biologist prior to any clearing, and the marked boundaries shall be maintained throughout the duration of construction work. Staging areas, including lay down areas and equipment storage areas, shall be flagged and fenced with ESA fencing. No personnel, equipment, or debris shall be allowed within the ESAs. Fencing and flagging shall be installed by the Contractor in a manner that does not impact habitats to be avoided and such that it is clearly visible to personnel on foot and operating heavy equipment. The Contractor shall submit to LASAN final plans for initial clearing and grubbing of habitat and project construction 10 days prior to initiating impacts. Temporary construction fencing and markers shall be maintained in good repair by the Contractor until the completion of each phase of project construction and removed upon completion of each project phase.</p> <p>No work activities, materials or equipment storage or access shall be permitted outside the identified work area without express written permission from LASAN. All parking and equipment storage related to the project shall be confined to the identified work area by the Contractor. Undisturbed areas and off-site sensitive habitat shall not be used for parking or equipment storage. Project-related vehicle traffic shall be restricted to the project limits, established roads and construction access points, and designated staging areas within the identified work area.</p>	<p>contractor to delineate project boundaries using construction fencing and flagging in coordination with the qualified biologist.</p>	
<p><b>BIO-5: Construction Staging and Vehicle Use.</b> All construction-related vehicles and equipment storage shall occur in the staging area and/or previously disturbed areas as approved by the project biologist. Project-related vehicle traffic shall be restricted to established roads, construction areas, and staging and parking areas. If construction activity extends beyond the</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> Project specifications will restrict construction to approved areas.</p>	<p><b>Implementation:</b> LASAN <b>Monitoring and Reporting:</b> LASAN</p>





<p>construction fencing into sensitive vegetation communities, areas of disturbance shall be quantified and an appropriate restoration approach shall be developed in consultation with the appropriate resource agencies. For example, if construction extends beyond the limits of the construction fencing, temporarily disturbed areas shall be restored to the natural (preconstruction) conditions, which may include the following: salvage and stockpiling of topsoil, re-grading of disturbed sites with salvaged topsoil, and re-vegetation with native locally available plant species.</p>		
<p><b>BIO-6: Prepare Compensatory Restoration Plan.</b>          Impacts to sensitive vegetation communities (blue elderberry stands, chaparral [both alliances], coastal sage scrub [all alliances], mule fat thickets, and willow riparian [Arroyo Willow and Black Willow Thickets]) shall be mitigated through the restoration or enhancement of habitat onsite at a 1:1 ratio.          Restoration/enhancement shall be provided through the removal of non-native plant species onsite, including tree of heaven, pepper tree, olive tree, and non-native plants associated with non-native grasslands, and the replacement with native plant communities. If sufficient suitable area is not available within the vicinity of the project impact area, then offsite mitigation options will be pursued. A Restoration Plan shall be prepared for the project that will detail the communities to be restored, location for restoration, container plant palettes and/or seed mixes, and maintenance and monitoring requirements.</p>	<p><b>Timing:</b> Pre-construction, construction, and post-construction</p> <p><b>Methods:</b> LASAN will prepare and implement a Restoration Plan to mitigate impacts to sensitive vegetation communities</p>	<p><b>Implementation:</b> LASAN  <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>
<p><b>BIO-7: Information Signage.</b>          Educational signage at the trailheads shall include information on the sensitivity of the vegetation communities (including jurisdictional resources) and native plant and animal species that naturally occur along the trail. Such signage shall include information reminding hikers and equestrians to stay on the designated trails. Periodic low stature signs shall be placed along the trails reminding hikers and equestrians of sensitive habitat areas and to please stay on the trails to help protect sensitive habitat, plants, and wildlife.</p>	<p><b>Timing:</b> Pre-construction, construction, and post-construction</p> <p><b>Methods:</b> LASAN will create and post educational signage</p>	<p><b>Implementation:</b> LASAN  <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>
<p><b>BIO-8: Long-Term Management of Invasive Weeds.</b></p>	<p><b>Timing:</b> Post-construction</p>	<p><b>Implementation:</b> LASAN</p>



<p>Long-term trail maintenance shall include the removal of invasive weeds (those identified by the California Invasive Plant Council [Cal-IPC] as having a moderate or high level of invasiveness or plants considered locally invasive) immediately adjacent to the trails.</p>	<p><b>Methods:</b> LASAN will provide long-term trail maintenance to include the removal of invasive weeds</p>	<p><b>Monitoring and Reporting:</b> LASAN</p>
<p><b>BIO-9: Pre-Construction Special Status Plant Surveys.</b>          Prior to construction of each phase, a qualified biologist retained by LASAN shall conduct pre-construction surveys for special status plant species including Plummer’s mariposa lily. If one or more species are detected, then LASAN shall consult with the appropriate resource agencies to develop additional minimization measures prior to project construction (if necessary). These additional measures may include construction monitoring, seed or bulb collection, and seeding or planting of bulbs.</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> LASAN will arrange for a qualified biologist to conduct a preconstruction survey for special status plants</p>	<p><b>Implementation:</b> LASAN  <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>
<p><b>BIO-10: Coastal California Gnatcatcher (CAGN) and Least Bell’s Vireo (LBVI) Avoidance and Minimization Measures.</b>          LASAN shall implement the following avoidance and minimization measures prior to and during construction of the proposed project:</p> <p>a. If feasible, construction activities including vegetation trimming or removal within CAGN habitat (all coastal sage scrub communities) shall occur outside of the CAGN breeding season. The breeding season for CAGN is defined as February 15 through August 31 each year.</p> <p>Regardless of the time of year that construction takes place, preconstruction clearance surveys shall be conducted in all coastal sage scrub habitat prior to habitat removal because CAGN is resident in coastal sage scrub year-round. Additionally, during the breeding season, preconstruction clearance surveys shall be conducted in all suitable habitats within 500 feet of proposed construction activities. A minimum of three focused surveys shall be conducted on separate days by a qualified biologist to determine the presence of CAGN. The surveys shall begin a maximum of seven (7) days prior to project construction</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> LASAN will provide a qualified biologist to conduct preconstruction nest surveys for CAGN and LBVI. The qualified biologist will monitor construction and prevent exceeding project limits.</p>	<p><b>Implementation:</b> LASAN  <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>



<p>and one survey shall be conducted by the project biologist the day immediately prior to the initiation of work. Should CAGN be detected within the work area, work shall be directed to unoccupied areas until the biologist determines that the CAGN has left the work area.</p> <p>b. If feasible, construction activities including vegetation trimming or removal with LBVI habitat (all willow riparian communities and mule fat thickets) shall occur outside of the LBVI breeding season. The breeding season for LBVI is defined as March 15 through September 15 each year.</p> <p>If construction must occur during the breeding season for LBVI, then pre-construction nesting LBVI surveys shall be conducted by a qualified biologist. A minimum of three focused surveys shall be conducted on separate days by a qualified biologist to determine the presence of LBVI. The surveys shall begin a maximum of 7 days prior to project construction and one survey shall be conducted by the project biologist the day immediately prior to the initiation of work. Should LBVI be detected within the work area, work shall be directed to unoccupied areas until the biologist determines that the LBVI has left the work area.</p> <p>c. If an active CAGN or LBVI nest is found within the work area, work will be immediately halted and redirected to areas at least 500 feet away until the biologist determines that the young have fledged or nest(s) has been abandoned.</p> <p>If an active CAGN or LBVI nest is found within 500 feet of project construction, the project biologist shall work with the contractor so as to maintain noise levels of less than 60 dBA Leq at the nest location. If noise levels cannot be maintained below that level, then construction work shall be postponed within 500 feet of the nest(s) until the young</p>		
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<p>have fledged.</p> <p>d. A qualified biologist shall conduct full-time monitoring during clearing of CAGN and LBVI habitat to ensure that work limits are not exceeded and that these target wildlife species are not present during habitat removal.</p> <p>e. Pets of project personnel shall not be allowed on the project site.</p>		
<p><b>BIO-11: Pre-Construction Nesting Surveys.</b> Should clearing and grubbing be initiated during nesting season (February 15 through August 30), pre-construction nesting surveys shall be conducted within 7 days of construction commencement. Should a nest be found within or adjacent to the construction work area, a buffer shall be installed and the nest area shall be avoided until the young fledges or the nest becomes inactive. The size of the buffer shall be determined by a qualified biologist based on the topography, noise/activity in the vicinity, and bird behavior.</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> LASAN will provide a qualified biologist to monitor during construction activity. The qualified biologist will instruct construction personnel as part of normal construction procedures if active nests are found.</p>	<p><b>Implementation:</b> LASAN <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>
<p><b>BIO-12: Prepare Stormwater Pollution Prevention Plan (SWPPP) and Secure Permit Authorizations.</b> LASAN shall prepare a SWPPP in accordance with the Clean Water Act. The SWPPP shall prohibit the disposal or temporary placement of excess fill, brush or other debris in U. S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) jurisdictional areas or their banks. The City will be responsible for securing and complying with all required permits, including but not limited to, the National Pollution Discharge Elimination System (NPDES) General Construction Permit per the requirements of the Clean Water Act.</p> <p>The SWPPP shall require the storage of hazardous materials and equipment stored overnight, including small amounts of fuel to refuel hand-held equipment, to include secondary containment when within 50 feet of open water to the fullest extent practicable.</p>	<p><b>Timing:</b> Design, pre-construction, and construction</p> <p><b>Methods:</b> LASAN will submit a Notice of Intent to the State Water Resources Control Board (SWRCB). Construction Contractor will develop a stormwater pollution prevention plan (SWPPP) and will file the project registration documents (PRDs) in the state's Stormwater Multi Application and Report Tracking System (SMARTS). Contractor will use the appropriate BMPs to control erosion and sedimentation.</p>	<p><b>Implementation:</b> LASAN <b>Monitoring and Reporting:</b> LASAN, U. S. Forest Service (if required)</p>



<p>Secondary containment shall consist of a ring of sand bags around each piece of stored equipment/structure. A plastic tarp/visqueen lining with no seams shall be placed under the equipment and over the edges of the sandbags, or a plastic hazardous materials (HazMat) secondary containment unit shall be utilized by the Contractor.</p> <p>No fuel containers or hazardous materials shall be placed or stored outside of the designated staging areas. Vehicle and equipment refueling shall occur within the designated staging areas, but at least 50 feet away from open water areas and 25 feet from habitat with potential to support federally listed species to the fullest extent practicable.</p> <p>Appropriate BMPs shall be used by the Contractor to control erosion and sedimentation to prevent deposition in waterways. No sediment or debris shall be allowed to enter drainages. Appropriate BMPs shall be used by the Contractor during construction to limit the spread of re-suspended sediment and contain debris.</p> <p>Construction and post-construction erosion and sediment control devices used for the proposed project, including fiber rolls and bonded fiber matrix, shall be made from biodegradable materials such as jute, with no plastic mesh, to avoid creating a wildlife entanglement hazard.</p>		
<p><b>Cultural Resources</b></p>		
<p><b>CR-1: Prepare for Discovery of Archaeological Resources.</b> On-site workers will be informed of the potential for discovery of archaeological resources or human remains during excavation or trenching as part of the Project's worker awareness program training.</p> <p>If an archaeological or cultural resource is encountered during ground- excavation activities within 50 feet of the discovery until a qualified archaeologist can evaluate whether the resource is a unique archaeological resource or historical resource as defined in</p>	<p><b>Timing:</b> Pre-construction and construction</p> <p><b>Methods:</b> LASAN will provide a qualified archaeologist to assess any archaeological or cultural resource encountered.</p>	<p><b>Implementation:</b> LASAN <b>Monitoring and Reporting:</b> LASAN</p>





<p>Public Resources Code Section 21083.2 and/or 14 C.C.R. Section 15064.5 or a tribal cultural resource as defined in Public Resources Code Section 21074 in consultation with the tribes. Work may continue in other areas. The project archaeologist in consultation with the tribal representatives shall determine importance and significance of the resource as tribal cultural resources, historical resources or unique archaeological resources, defined above. Recovery of artifacts or excavation for resource evaluations will be the responsibility of the City under the direction of a qualified archaeologist.</p>		
<p><b>Hazards and Hazardous Materials</b></p>		
<p><b>HAZ-1: Fire Prevention and Response Plan.</b>  LASAN shall be required to develop a Fire Safety Plan prior to beginning construction. The construction Fire Safety Plan shall address the following:</p> <ul style="list-style-type: none"> <li>• Procedures for reporting a fire.</li> <li>• Personnel and fire safety equipment the contractor will have on site.</li> <li>• Procedures to be taken on “red flag days” (days of extreme fire danger). On red flag days, trail construction would be discontinued.</li> <li>• Procedures to ensure that all power equipment is fire safe.</li> <li>• LASAN will bring only the necessary amount of fuel and fuel mixtures to operate the machinery on site. No flammable products will be stored or left on the project site. LASAN will be responsible for any clean-up of such contaminants in compliance with all applicable local, state, and federal laws.</li> <li>• All power equipment used on the trail will have spark arrestors.</li> <li>• LASAN shall have fire extinguishers and five gallon water pumps on site when operating power equipment.</li> </ul>	<p><b>Timing:</b> Design and construction</p> <p><b>Methods:</b> LASAN will prepare and implement a fire response plan for project construction.</p>	<p><b>Implementation:</b> LASAN  <b>Monitoring and Reporting:</b> LASAN</p>
<p><b>Noise</b></p>		
<p><b>N-1: Construction Noise Mitigation.</b>  Prior to any grading activity, the project operator will require all construction contractor/subcontractor employees to attend the worker environmental awareness program (WEAP) training prior</p>	<p><b>Timing:</b> Design and construction</p> <p><b>Methods:</b> LASAN will incorporate this measure into</p>	<p><b>Implementation:</b> LASAN  <b>Monitoring and Reporting:</b> LASAN</p>



<p>initiating their activities. All contract and subcontract employees will be required to implement the following noise attenuation measures during all phases of construction:</p> <ul style="list-style-type: none"> <li>a. Noise levels of any Project use or activity will be maintained at or below adopted County noise standards (Section 41.40 of the Los Angeles Municipal Code). The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only.</li> <li>b. No person shall, between the hours of 7:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power driven drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified.</li> <li>c. Construction equipment will be muffled per manufacturer's specifications.</li> <li>d. All stationary construction equipment will be placed in a manner so that emitted noise is directed away or blocked from sensitive receptors nearest the project site.</li> </ul>	<p>contract specifications for all construction work to reduce noise impacts.</p>	
<p><b>Transportation/Circulation</b></p>		
<p><b>T-1: Project Ingress/Egress Safety.</b>  LASAN shall include traffic safety improvements for the project access driveway at Terra Vista Way to increase sight distances from the point of access and from adjacent roadways (e.g. Terra Vista Way). This will include the provision of signage (as needed) in all directions to notify vehicles approaching or passing the site access driveway, roadway re-striping or median, and, if necessary, realignment. The roadway improvements will be coordinated with</p>	<p><b>Timing:</b> Design and pre-construction</p> <p><b>Methods:</b> LASAN will prepare and submit final engineering plans to the City's DOT and BOE for approval in conjunction with the encroachment permit</p>	<p><b>Implementation:</b> LASAN</p> <p><b>Monitoring and Reporting:</b> LASAN with coordination with the City of Los Angeles Department of Transportation (DOT) and Bureau of Engineering (BOE).</p>



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the City's Department of Transportation and Bureau of Engineering as part of the encroachment permit approval process. Traffic control measures will be implemented in conjunction with construction.	application.	
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