

# **FIG + PICO CONFERENCE CENTER HOTELS**

---

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

The City of Los Angeles (City) 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, which were voluntarily incorporated into the project description, and applies mitigation measures needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the project design features and mitigation measures identified for the Project.

### **2. Organization**

As shown on the following pages, each project design feature and mitigation measure 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 project design feature or mitigation measure;
- **Monitoring Agency:** The agency to which reports involving feasibility, compliance, implementation and development are made;
- **Monitoring Phase:** The phase of the Project during which the project design feature or mitigation measure shall be monitored;

- **Monitoring Frequency:** The frequency at which the project design feature or mitigation measure shall be monitored; and
- **Action Indicating Compliance:** The action of which the Enforcement or Monitoring Agency indicates that compliance with the required project design feature or mitigation measure 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 project design feature and mitigation measure and shall be obligated to provide verification, as identified below, to the appropriate monitoring and enforcement agencies that each project design feature and mitigation measure has been implemented. The Applicant shall maintain records demonstrating compliance with each project design feature and mitigation measure listed below. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant, the election of which is in the sole discretion of the Applicant), approved by the City of Los Angeles Department of City Planning which approval shall not be reasonably withheld, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with mitigation measures and project design features within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of written 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**

The project shall be in substantial conformance with the project design features and mitigation measures contained in this Mitigation Monitoring Program. The enforcing departments or agencies may determine substantial conformance with project design features and mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a project design feature or mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, Sections 15162 and 15164, including by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the project design features or mitigation measures. Any addendum or subsequent CEQA clearance shall explain why the project design feature or mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a project design feature or mitigation measure shall not require a modification to any project

discretionary approval unless the Director of Planning also finds that the change to the project design features or mitigation measures results in a substantial change to the Project or the non-environmental conditions of approval.

## 5. Project Design Features, Mitigation Measures, and Implementation

### Aesthetics

#### Project Design Features

**PDF AES-1: Construction Fencing:** During construction of the Project, a construction fence for safety and to screen views to the Project Site shall be installed. The fence shall be located along the north, south, east and west perimeters of the Project Site with a minimum height of 8 feet.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Periodic field inspections during construction
<b>Action Indicating Compliance:</b>	Field inspection sign-off; Compliance certification report by Project contractor

**PDF AES-2: Screening of Utilities and Loading Areas:** All utilities associated with the Project shall be screened from public view. All loading areas shall be located interior to the buildings or screened from public view.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Once at Project plan check; Once during field inspection
<b>Action Indicating Compliance:</b>	Field inspection sign-off; Compliance certification report by Project contractor

**PDF AES-3: Glare:** Glass and other building materials used in exterior façades shall be low reflective and/or treated with a non-reflective coating in order to minimize glare. Prior to issuance of a building permit, the Department of Building and Safety shall review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials permitted by the applicable building codes, and shall not cause significant glare impacts on motorists or nearby residential uses. Glass with coatings required to meet the California Energy Code requirements shall be permitted, consistent with

applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Once at Project plan check; Once during field inspection
<b>Action Indicating Compliance:</b>	Plan approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

**PDF AES-4:** Light sources associated with Project construction shall be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Prior to occupancy; Post-occupancy
<b>Monitoring Frequency:</b>	Once at Project plan check; Once during field inspection following construction
<b>Action Indicating Compliance:</b>	Plan approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

## Air Quality

### Project Design Features

**PDF AQ-1: Green Building Measures:** The Project shall be designed and operated to include energy and resource efficient features that exceed regulatory requirements, which shall include the following:

- The Project shall include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings).
- The Project shall install energy efficient appliances that meet the 2017 ENERGY STAR® rating standards or equivalent for both hotel and restaurant land uses.
- The Project shall include efficient heating, ventilation, and air conditioning (HVAC) systems (2017 ENERGY STAR® rating standards or equivalent).
- The parking structure shall be designed with occupancy-sensor controlled lighting that places lighting fixtures in a low power state in unoccupied zones.
- To encourage carpooling and the use of electric vehicles by Project employees, guests, and visitors, the Project shall designate a minimum of 5 percent of on-site parking for carpool and/or alternative-



fueled vehicles, and the Project design shall provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into 10 percent of the parking spaces.

<b>Enforcement Agency:</b>	Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction; Operation
<b>Monitoring Frequency:</b>	Once at plan check prior to issuance of grading permit; Once within 180 days of receipt of Certificate of Occupancy
<b>Action Indicating Compliance:</b>	Plan approval and issuance of applicable building permit

**PDF AQ-2: Construction Features:** Construction equipment operating at the Project Site will be subject to a number of requirements. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 interim off-road emissions standards for equipment rated at 50 horsepower (hp) or greater during Project construction. All equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.
- Equipment such as tower cranes and welders shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use with electric tools, equipment, lighting, etc.
- Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are readily available from local suppliers/vendors.
- All on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the Project Site shall be engine model year 2012 or later or shall comply with the USEPA 2007 on-road emissions standards.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Continuous field inspections during construction, with quarterly reporting

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

**PDF-AQ-3: Control of VOCs:** The Project shall utilize low-emitting materials pursuant to the requirements of the California Green Building Standards (CALGreen) Code. Indoor coatings shall be limited to 50 grams per liter of VOCs or less.

**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

## Cultural Resources

### Mitigation Measures

**MM CULT-1:** Prior to the issuance of any grading, excavation, or ground disturbance permit, the applicant shall execute a covenant acknowledging and agreeing to comply with all the terms and conditions established herein which shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Department of City Planning for retention in the administrative record for Case No. ENV 2016-2594-EIR.

- a. All initial grading and all excavation activities shall be monitored by a Project archaeologist. The Project archaeologist shall be present full-time during the initial disturbances of matrix with potential to contain cultural deposits and will document activity.
- b. The services of an archaeologist, qualified for historic resource evaluation, as defined in CEQA and Office of Historic Preservation (OHP) Guidelines, shall be secured to implement the archaeological monitoring program. The qualified archaeologist shall be listed, or be eligible for listing, in the Register of Professional Archaeologist (RPA). Recommendations may be obtained by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton.
- c. In the event of a discovery, or when requested by the Project archaeologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially significant archaeological resources.
  - i. It shall be the responsibility of the Project archaeologist to: determine the scope and significance of the find; determine the appropriate documentation, preservation, conservation, and/or relocation of the find; and determine when grading/excavation activities may resume in the area of the find.

- ii. Determining the significance of the find shall be guided by California Public Resources Code Division 13, Chapter 1, Section 21083.2, subdivision (g) and (h). If the find is determined to be a “unique archaeological resource”, then the applicant, in conjunction with the recommendation of the Project archaeologist, shall comply with Section 21083.2, subdivisions (b) through (f).
  - iii. If at any time the Project Site, or a portion of the Project Site, is determined to be a “historical resource” as defined in California Code of Regulations Chapter 3, Article 1, Section 15064.5, subdivision (a), the Project archaeologist shall prepare and issue a mitigation plan in conformance with Section 15126.4, subdivision (b).
  - iv. If the Project archaeologist determines that continuation of the Project or Project-related activities will result in an adverse impact on a discovered historic resource which cannot be mitigated, all further activities resulting in the impact shall immediately cease, and the Lead Agency shall be contacted for further evaluation and direction.
  - v. The applicant shall comply with the recommendations of the Project archaeologist with respect to the documentation, preservation, conservation, and/or relocation of finds.
- d. Monitoring activities may cease when:
- i. Initial grading and all excavation activities have concluded; or
  - ii. By written consent of the Project archaeologist agreeing that no further monitoring is necessary. In this case, a signed and dated copy of such agreement shall be submitted to the Dept. of City Planning for retention in the administrative record for Case No. ENV 2016-2594-EIR.
- e. At the conclusion of monitoring activities, and only if archaeological materials were encountered, the Project archaeologist shall prepare and submit a report of the findings to the South Central Coastal Information Center.
- f. At the conclusion of monitoring activities, the Project archaeologist shall prepare a signed statement indicating the first and last date monitoring activities took place, and submit it to the Dept. of City Planning, for retention in the administrative file for Case No. ENV 2016-2594-EIR.

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

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

**Monitoring Phase:** Construction

**Monitoring Frequency:** At time of resource discovery, should it occur

**Action Indicating Compliance:** Compliance report by qualified archaeologist

**MM CULT-2:** If any paleontological materials are encountered during the course of Project development, all further development activity shall halt and the following shall be undertaken:

- a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology-USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum-who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- b. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
- d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
- e. Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- f. A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	At time of resource discovery, should it occur
<b>Action Indicating Compliance:</b>	Compliance report by qualified paleontologist

## Geology and Soils

### Project Design Features

**PDF GEO-1:** A qualified geotechnical engineer shall be present on the Project Site during excavation, grading, and general Project Site preparation activities to monitor implementation of the recommendations specified in the geotechnical reports.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Present throughout excavation, grading, and Site preparation activities



**Action Indicating Compliance:** Geotechnical Engineer's Site visit reports as needed

## Greenhouse Gas Emissions

### Project Design Features

See Project Design Features PDF AQ-1, PDF AQ-2, and PDF TRAF-1.

## Hazards and Hazardous Materials

### Mitigation Measures

**MM-HAZ-1:** Prior to the issuance of a grading permit, the construction contractor shall demonstrate that they have retained a qualified environmental professional to prepare and implement a site-specific Health and Safety Plan in accordance with the performance standards and implementation requirements of the federal OSHA regulations (29 CFR 1910.120) and Cal/OSHA regulations (8 CCR Title 8, Section 5192). The Health and Safety Plan shall be submitted to the City for review and approval. The Health and Safety Plan shall include all required measures to protect construction workers and the general public potentially exposed to hazardous materials by including engineering controls, monitoring, and security measures to prevent unauthorized entry to the construction area and to reduce hazards outside of the construction area. If prescribed contaminant exposure levels or the performance standards in the Health and Safety Plan are exceeded, personal protective equipment shall be required for workers, and remedial actions taken, in accordance with state and federal regulations. The plan shall include designated personnel responsible for implementation of the Health and Safety Plan. Submittal of the Health and Safety Plan to the City shall not be construed as approval of the adequacy of the contractor's health and safety professional, the contractor's plan, or any safety measure taken in or near the construction site. The contractor shall be solely and fully responsible for compliance with all laws, rules, and regulations applicable to health and safety during the performance of the construction work.

**Enforcement Agency:** 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 grading permit; Ongoing with periodic field inspections during construction for Health and Safety Plan implementation

**Action Indicating Compliance:** Issuance of grading permit; Approval of Health and Safety Plan; Written compliance report by Project contractor

**MM-HAZ-2:** The construction contractor shall retain and consult a qualified environmental professional if contaminated soil is identified during construction activities. The construction contractor shall comply with and enforce the applicable provisions of the Health and Safety Plan to determine the proper handling, storage, and disposal procedures for any contaminated soils or materials discovered during construction.

**Enforcement Agency:** Los Angeles Department of Building and Safety

<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Pre-construction; Construction
<b>Monitoring Frequency:</b>	Once prior to issuance of grading permit; Ongoing with periodic field inspections during construction
<b>Action Indicating Compliance:</b>	Issuance of grading permit; Written compliance report by Project contractor

## Noise

### Project Design Features

**PDF NOISE-1: Prohibition of Idling:** The Project shall not allow delivery truck idling of main engines in the loading area pursuant to applicable City and State standards. Signs shall be posted prohibiting idling.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction; Operation
<b>Monitoring Frequency:</b>	Periodic field inspections
<b>Action Indicating Compliance:</b>	The General Contractor shall provide orientation training to all subcontractors regarding implementation of this measure; Field inspection sign-off; Compliance certification report submitted by Project contractor

### Mitigation Measures

**MM-NOISE-1:** The Project shall provide a temporary 15-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 10 dBA between the Project construction site and the Gilbert Lindsay Plaza (receptor R2) to the west and between the Project construction on-site and residential uses at the Circa project (receptor R5) to the north. Temporary noise barriers shall be used to block the ground level line-of-sight between the construction equipment and the noise sensitive receptors during early Project construction phases (up to the start of framing) when the use of heavy equipment is prevalent.

<b>Enforcement Agency:</b>	Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction

<b>Monitoring Frequency:</b>	Periodic field inspections
<b>Action Indicating Compliance:</b>	Field inspection sign-off; Compliance certification report submitted by Project contractor

**MM-NOISE-2:** The Project contractor(s) shall employ state-of-the-art noise minimization strategies when using mechanized construction equipment capable of achieving at least a 2 dBA noise reduction. The contractor(s) shall limit unnecessary idling of equipment on or near the site in compliance with the California Air Resources Board Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling (Title 13 California Code of Regulations, Section 2485). The contractor(s) shall place noisy construction equipment as far from the Project Site edges as practicable taking into consideration closeness to sensitive receptors and the location of the construction activity on the Project Site. The Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards that achieve at least a 2 dBA reduction in equipment engine noise levels as compared to the same equipment without noise mufflers. Absorptive mufflers capable of achieving at least a 2 dBA noise reduction are considered commercially available and state-of-the-art noise reduction for heavy duty equipment.

<b>Enforcement Agency:</b>	Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Periodic field inspections
<b>Action Indicating Compliance:</b>	The General Contractor shall provide orientation training to all subcontractors regarding implementation of this measure; Field inspection sign-off; Compliance certification report submitted by Project contractor

**MM-NOISE-3:** Heavy equipment, such as use of a large bulldozer (greater than 300 horsepower), and other similarly large vibration-generating equipment shall not be used within 80 feet of the neighboring residential structures. If such proximate construction is required, alternative equipment and methods such as small bulldozers (less than 300 horsepower), shall be used to ensure that vibration effects on adjacent residential uses would result in maximum vibration levels of less than 72 VdB at the Circa project (receptor R5) north of the Project Site.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Periodic field inspections

**Action Indicating Compliance:** The General Contractor shall provide orientation training to all subcontractors prior to initiation of earthmoving activities regarding implementation of this measure; Field inspection sign-off; Compliance certification report submitted by Project contractor

**MM-NOISE-4:** Perimeter railing with solid wall panels (glass, metal, masonry or similar) shall be installed along the outer edge of the pool deck areas on the 8th floor landscaped pool deck and the 41st floor rooftop pool deck on the Hotel A/B Tower. The railing shall be a minimum of 42 inches high and have no gaps between each panel or between the panel and floor, unless required by building code, wind load resistance standards, or other applicable standards. In such cases, gaps shall be kept to the minimum necessary to meet applicable code and standards.

**Enforcement Agency:** Los Angeles Department of Building and Safety

**Monitoring Agency:** Los Angeles Department of Building and Safety

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once prior to construction; Once after construction of specified areas

**Action Indicating Compliance:** Submittal of design plan indicating compliance; Compliance report provided by contractor

**MM-NOISE-5:** Prior to operating outdoor amplified music and entertainment speakers on the 8th floor landscaped pool deck of the Hotel A/B Tower, an acoustical design plan shall be submitted to the City, shown to result in a pool deck composite noise level at the south end perimeter rail of no more than 98 dBA Leq and at the north end of the perimeter rail of no more than 65 dBA Leq. The pool deck composite noise level is defined as the sound level resulting from the amplification of recorded or live music combined with simultaneous spoken word (i.e., D.J.) emanating from all speakers in use, and excluding noise from guests and the normal operation of the amenities lounge, food and beverage service. To achieve this performance level, the acoustical design plan may rely on, among other strategies and technologies the following:

- Directional speakers or arrays of smaller speakers shall be used so as to maximize on-site sound levels while minimizing the spread of sound beyond the pool deck perimeter. For example, within the pool area southwest of the amenities lounge, speakers placed around the pool should be directed towards the pool. Speakers located southwest of the pool shall be angled towards the pool or amenities lounge. Sound from all speakers shall be directed below the top of the railing (if necessary, downward tilted at an appropriate angle). All ceiling-mounted speakers shall be oriented directly downward towards the floor.
- Within the outdoor seating areas northeast of the amenities lounge, speakers shall be generally directed towards the interior of the property. Sound from all speakers shall be directed below the top of the railing (if necessary, downward tilted at an appropriate angle). All ceiling-mounted speakers shall be oriented directly downward towards the floor.



- The areas shall be designed with the strategic use of materials with high sound absorption properties within the pool deck area and shall avoid using highly sound-reflective surfaces, to the extent possible, at the amenities lounge.
- The use of amplified speakers for recorded or live music performances shall be limited to up to 2:00 A.M.
- All disc jockeys (DJs) and musicians shall utilize the on-site sound system. The DJs and musicians shall use speakers set at or below pre-approved settings and in predetermined speaker locations and directions.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Operation
<b>Monitoring Frequency:</b>	Periodic field inspections prior to events at specified areas
<b>Action Indicating Compliance:</b>	Compliance verification (acoustical design plan) submitted by technical noise expert

**MM-NOISE-6:** Prior to operating outdoor amplified music and entertainment speakers on the 37<sup>th</sup> floor rooftop deck of the Hotel A/B Tower, an acoustical design plan shall be submitted to the City, shown to result in a rooftop deck composite noise level of no more than 90 dBA Leq at the perimeter rail. The rooftop deck composite noise level is defined as the sound level resulting from the amplification of recorded or live music combined with simultaneous spoken word (i.e., DJ) emanating from all speakers in use, and excluding noise from guests and the normal operation of the amenities lounge, food and beverage service. To achieve this performance level, the acoustical design plan may rely on, among other strategies and technologies the following:

- The use of directional speakers or arrays of smaller speakers so as to maximize on-site sound levels while minimizing the spread of sound beyond the rooftop deck perimeter. For example, speakers placed around the rooftop area should be directed towards the interior of the space. Sound from all speakers shall be directed below the top of the railing (if necessary, downward tilted at an appropriate angle). All ceiling-mounted speakers shall be oriented directly downward towards the floor.
- The area shall be designed with the strategic use of materials with high sound absorption properties within the pool deck area and shall avoid using highly sound-reflective surfaces, to the extent possible, at the bar, restroom, and elevator/stairwell walls.
- The use of amplified speakers for recorded or live music performances shall be limited to up to 2:00 A.M.
- All disc jockeys (DJs) and musicians shall utilize the on-site sound system. The DJs and musicians shall use speakers set at or below pre-approved settings and in predetermined speaker locations and directions.

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety

<b>Monitoring Phase:</b>	Operation
<b>Monitoring Frequency:</b>	Periodic field inspections prior to events at specified areas
<b>Action Indicating Compliance:</b>	Compliance verification (acoustical design plan) submitted by technical noise expert

## Fire Protection

### Project Design Features

See Project Design Feature PDF TRAF-1.

## Police Protection

### Project Design Features

**PDF POL-1: On-Site Construction Security Measures:** During construction, on-site security measures shall include:

- Private security personnel shall monitor vehicle and pedestrian access to the construction areas and the Project Site; and
- Construction fencing with gated and locked entry shall be installed around the perimeter of the construction site

<b>Enforcement Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Periodic field inspections
<b>Action Indicating Compliance:</b>	Field inspection sign-off; Compliance certification report submitted by Project contractor

**PDF POL-2: Provision of Project Diagrams to LAPD:** Prior to the issuance of a building permit, the Project shall provide the LAPD Central Area Commanding Officer with a diagram of each portion of the Project Site, including access routes, gate access codes, and additional information, as required, to facilitate potential LAPD responses.

<b>Enforcement Agency:</b>	Los Angeles Police Department
<b>Monitoring Agency:</b>	Los Angeles Police Department
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Once prior to Certificate of Occupancy

**Action Indicating Compliance:** Sign-off on Los Angeles Police Department reviewed diagrams;  
Certificate of Occupancy

**PDF POL-3: On-Site Operational Security Measures:** The Project shall provide an extensive security program to ensure the safety of hotel guests, employees and other visitors to the Project Site. On-site security measures during Project operation shall include:

- Comprehensive coverage and monitoring of key areas through Close Circuit Television (CCTV) systems;
- Access to non-public areas of the Project shall be restricted by electronically controlled locking and access cards;
- Full time 24-hour security shall be provided, including security in each hotel tower along with roving patrols

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

**Monitoring Agency:** Los Angeles Department of City Planning, Los Angeles Department of building and Safety

**Monitoring Phase:** Post-occupancy

**Monitoring Frequency:** Once at Project plan check; Once during field inspection following construction

**Action Indicating Compliance:** Plan approval and issuance of applicable building permit;  
Issuance of Certificate of Occupancy

See Project Design Feature PDF TRAF-1.

## Transportation and Traffic

### Project Design Features

**PDF TRAF-1: Construction Management Plan:** A detailed Construction Management Plan shall be submitted to the City's Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The Construction Management Plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The Construction Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following mandatory elements:

- 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.

- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Figueroa Street, Flower Street, and Pico Boulevard, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's Figueroa Street, Flower Street and Pico Boulevard driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Sequencing construction activity to reduce the amount of construction-related traffic on arterial streets.
- Contain construction activity within the Project Site boundaries.
- Coordination with LADOT to address any overlapping of construction with the MyFigueroa project.
- Coordination with Metro to address any construction near the railroad right of way.
- Safety precautions for pedestrians and bicyclists through alternate routing and protection barriers/fencing that shall be implemented.
- Scheduling of construction-related deliveries and haul trips so as to occur outside the commuter peak hours.

**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; Continuous field inspections during construction, with quarterly reporting

**Action Indicating Compliance:** Approval of Construction Management Plan from the Los Angeles Department of Transportation prior to issuance of Building Permit; Compliance certification report submitted by Project contractor

## Mitigation Measures

**MM-TRAF-1 (Transportation Demand Management Program):** A Transportation Design Management (TDM) program shall be prepared to reduce the use of single occupant vehicles (SOV) during commute hours by increasing the number of trips by walking, bicycle, carpool, vanpool and transit.

A preliminary TDM program shall be prepared and provided for LADOT review prior to the issuance of the first building permit for this Project and a final TDM program approved by LADOT is required prior to issuance of the first certificate of occupancy for the Project. As recommended by the transportation study, the TDM program shall include, but is not limited to, the following:



- Provide a transportation information center and on-site TDM coordinator to educate employers, employees, hotel guests, and customers of surrounding transportation options
- Promote bicycling and walking through amenity upgrades such as exclusive access points, secured bicycle parking, sidewalk pavement improvements, wayfinding signage, etc. around the Project Site
- Promote and support carpool/vanpool/rideshare use through parking incentives and administrative support
- Incorporate incentives for using alternative travel modes
- Support existing and/or future efforts by LADOT for Mobility Hubs by providing amenities such as bicycle parking, rentals, shared vehicle rentals, transit information, etc. at the Project Site (subject to design feasibility)
- Make a one-time fixed-fee financial contribution of \$100,000 to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the general Downtown Los Angeles area of the Project

**Enforcement Agency:** Los Angeles Department of Transportation

**Monitoring Agency:** Los Angeles Department of Transportation

**Monitoring Phase:** Prior to occupancy; Post-occupancy

**Monitoring Frequency:** Once prior to issuance of final Certificate of Occupancy

**Action Indicating Compliance:** Los Angeles Department of Transportation approval of TDM program; Annual consistency review

**MM-TRAF-2 (Transportation Systems Management Improvements):** The Project shall contribute up to \$30,000 toward Transportation Systems Management (TSM) improvements that would better accommodate intersection operations and increase intersection capacity throughout the study area. LADOT's ATSAC Section has identified the following upgrades as part of the TSM improvements:

- Fiber optic upgrades along South Figueroa Street from Pico Boulevard to Olympic Boulevard for (\$20,000)
- Two CCTV camera upgrades at Pico Boulevard and Figueroa St, and LA Live Way and Pico Boulevard (\$10,000)

These upgrades would improve the network capacity for real-time video monitoring of intersection, corridor, transit, and pedestrian operations in Downtown Los Angeles by reducing delays experienced by motorists at study intersections.

A final determination on how to implement these CCTV installations will be made by LADOT prior to the issuance of the first building permit. These installations will be implemented either by the Applicant through the B-Permit process of the Bureau of Engineering (BOE), or through payment of a one-time fixed fee of \$30,000 to LADOT to fund the cost of the upgrades. If LADOT selects the payment option, then a required payment of \$30,000 shall be provided to LADOT, and LADOT shall design and construct the upgrades.

If the installations are implemented by the Applicant through the B-Permit process, then these improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the Applicant, provided that, in each case, the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

<b>Enforcement Agency:</b>	Los Angeles Department of Transportation
<b>Monitoring Agency:</b>	Los Angeles Department of Transportation; Los Angeles Bureau of Engineering
<b>Monitoring Phase:</b>	Prior to occupancy; Post-occupancy
<b>Monitoring Frequency:</b>	Once prior to issuance of final Certificate of Occupancy
<b>Action Indicating Compliance:</b>	Los Angeles Department of Transportation approval of TSM improvements; Annual consistency review

## Water Supply

**PDF-WS-1: Water Conservation Features:** The Project shall provide the following specific water efficiency features:

- High efficiency waterless hybrid type urinals
- High efficiency water closet with flush volume of 1.1 gallons of water per flush
- ENERGY STAR® certified light commercial clothes washers – water factor of 4.2 or less, with a capacity of 4.5 cubic feet or smaller
- Domestic water heating system located close proximity to point(s) of use
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers
- Water-saving pool filter
- Pool/spa recirculating filtration equipment
- Pool splash troughs around the perimeter that drain back into the pool
- Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
- Reuse pool backwash water for irrigation
- Leak detection system for swimming pools and spas
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned Irrigation (groups plants with similar water requirements together)
- Landscaping contouring to minimize precipitation runoff
- Drought tolerant plants – 70 percent of total landscaping

<b>Enforcement Agency:</b>	Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
<b>Monitoring Agency:</b>	Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
<b>Monitoring Phase:</b>	Construction
<b>Monitoring Frequency:</b>	Once prior to issuance of final Certificate of Occupancy
<b>Action Indicating Compliance:</b>	Issuance of final Certificate of Occupancy

## Energy

### Project Design Features

See Project Design Features PDF AQ-1, PDF AQ-2, and PDF TRAF-1.