
4. 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 business 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

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made by the Applicant or its successor subject to the approval by the City. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary due to the nature of the MMP, the need to protect the environment in the most efficient manner, and the need to reflect changes in regulatory conditions, such as but not limited to changes to building code requirements. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

5. Project Design Features, Mitigation Measures, and Implementation

Aesthetics

Project Design Features

PDF AES-1: All mechanical and electrical equipment that is located on the rooftops would be screened from public view.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

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

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

PDF AES-2: The maximum height of any building constructed as part of the Project would be 150 feet.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

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

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

PDF AES-3: Utility equipment would be placed underground, screened from public view, or incorporated into the design of the Project.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

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

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

PDF AES-4: The Project shall include security lighting. Lighting associated with the Project shall be directed downward or toward the interior of the Project Site. All exterior residential lighting shall be designed with internal and/or external glare control and shall be designed, arranged, directed, or shielded to contain direct illumination on-site, thereby preventing excessive illumination and light spillover onto adjacent land uses and/or roadways.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Prior to occupancy; 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

PDF AES-5: The exterior of the proposed structures shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

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

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

PDF AES-6: Tenant signs for the ground-floor retail and restaurant uses shall not include blinking, flashing, or oscillating lights.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Prior to occupancy; 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

Air Quality

Mitigation Measures

MM AIR-1: During site preparation activities, limit simultaneous operation of off-road equipment to no more than five pieces of equipment.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Present throughout excavation, grading, and site preparation activities

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

Geology and Soils

Mitigation Measures

MM GEO-1: The Project shall comply with the recommendations found on pages 6 through 23 of the Report of Geotechnical Investigation, R.T. Frankian & Associates, September 25, 2014 (included as Appendix H to the Draft EIR), to the satisfaction of the Bureau of Engineering.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency:	Los Angeles Department of Building and Safety
Monitoring Phase:	Pre-construction; Construction
Monitoring Frequency:	Once at Project plan check; Periodic field inspections
Action Indicating Compliance:	Plan approval and issuance of applicable building permit; Field inspection sign-off; Compliance certification report submitted by Project contractor; Issuance of Certificate of Occupancy

Greenhouse Gas Emissions

Project Design Features

PDF GHG-1: The Project would encourage carpooling and the use of electric vehicles by providing that at least 20 percent of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

At least five percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the five percent requirement results in a fractional space, round up to the next whole number.

Enforcement Agency:	Los Angeles Department of Building and Safety
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Monitoring Agency:	Los Angeles Department of Building and Safety
Monitoring Phase:	Construction
Monitoring Frequency:	Once prior to issuance of final Certificate of Occupancy
Action Indicating Compliance:	Issuance of final Certificate of Occupancy

Hazards and Hazardous Materials

Mitigation Measures

MM HAZ-1: Following demolition of the existing structures and removal of the debris from the Project Site, a full Phase II Environmental Site Assessment of the Project Site shall be performed. If soil and/or groundwater contamination is encountered, a detailed Soil Management Plan for the segregation of contaminated soils and materials shall be developed and implemented in accordance with applicable laws and regulations. The Soil Management Plan shall be submitted to the Department of Building and Safety Grading Division for approval prior to the issuance of a grading permit.

Enforcement Agency:	Los Angeles Department of Building and Safety
Monitoring Agency:	Los Angeles Department of Building and Safety
Monitoring Phase:	Construction
Monitoring Frequency:	Once following demolition; Review of Phase II Report and approval of Soil Management Plan (if recommended by Phase II Report) prior to issuance of Grading Permit
Action Indicating Compliance:	The General Contractor shall provide orientation training to all subcontractors prior to initiation of earthmoving activities regarding implementation of applicable Soil Management Plan recommendations; Field inspection sign-

off; Compliance certification report submitted by Project contractor

Noise

Project Design Features

PDF NOI-1: The HVAC system and associated mechanical equipment proposed for the Project will be located on the roof of the building and not at ground level.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

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

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

Mitigation Measures

MM NOI-1: The construction staging area shall be located as far from sensitive receptors, particularly the Molino Lofts and Barker Block residences, as possible.

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

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

MM NOI-2: Temporary sound barriers, capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound wall or sound blankets), and capable of blocking the line-of-sight between the adjacent sensitive receptors, shall be installed. If the At Mateo project, 540 S. Santa Fe project, and/or the 500 S. Mateo project performs mass grading at its site at the same time as the Proposed Project, temporary sound barriers shall achieve attenuation of at least 15 dBA at the Project Site.

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: Periodic field inspections

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

MM NOI-3: Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with state-of-the-art noise shielding and muffling devices that will reduce noise by 3 dBA (consistent with manufacturers' standards), including solar-powered and electricity from electric power poles as options. All equipment shall be properly maintained to assure that no additional noise due to worn or improperly maintained parts would be generated.

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

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 NOI-4: Two weeks prior to the commencement of construction, notification shall be provided to the immediate surrounding off-site residential and noise-sensitive commercial uses that discloses the construction schedule, including the types of activities and equipment that would be occurring/operating throughout the duration of the construction period.

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 at plan check prior to issuance of a demolition permit

Action Indicating Compliance: Plan approval and issuance of a demolition permit

MM NOI-5: Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 50 feet from abutting sensitive receptors (Molino Lofts at 530 Mateo Street; 544 Mateo Street).

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

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 NOI-6: Construction haul trucks shall avoid accessing residential streets. Haul trucks shall enter and exit the Project Site via Santa Fe Avenue.

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

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

MM NOI-7: Construction workers shall park at designated locations and shall be prohibited from parking on nearby residential streets.

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

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

MM NOI-8: A noise disturbance coordinator shall be established to respond to local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.

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

MM NOI-9: All residential units located within 2,000 feet of the construction site shall be sent a notice informing the residences of the construction schedule of the Proposed Project. A sign shall also be posted at the construction site notifying residences of construction activities. All notices and signs shall display the dates of construction activities, as well as provide a telephone number where residents can contact the noise disturbance coordinator about the construction process and register complaints.

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

MM NOI-10: Construction activities shall utilize rubber tired equipment in place of steel-track equipment whenever feasible.

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
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 NOI-11: The noise disturbance coordinator identified in Mitigation Measure NOI-MM-8 shall also be responsible for receiving local complaints about construction vibration. The disturbance coordinator shall determine the cause of the vibration complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.

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

Fire Protection

Project Design Features

PDF FIR-1: The construction contractors and work crews shall properly maintain the mechanical equipment according to best practices and the manufacturers' procedures, ensure proper storage of flammable materials, and cleanup of spills of flammable liquid.

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

PDF FIR-2: If there are partial closures to streets surrounding the Project Site, flagmen shall be used to facilitate the traffic flow until the street closure around the construction is complete.

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

PDF FIR-3: During demolition and construction, LAFD access from major roadways shall remain clear and unobstructed.

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

PDF FIR-4: The design of the Project Site shall provide adequate access for LAFD equipment and personnel to the structures.

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

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

Mitigation Measures

MM FIR-1: Submittal of a plot plan for approval by the LAFD either prior to the recordation of a final map or the approval of a building permit shall be required. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

In addition, the following recommendations of the LAFD relative to fire safety shall be incorporated into the building plans:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- The entrance to a residence lobby must be within 50 feet of the desired street address curb face.

- Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.
- The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.
- Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but, in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof.
- Entrance to the main lobby shall be located off the address side of the building.
- Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet of the visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.
- Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.
- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
- Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

- Submit plot plans indicating access road and turning area for Fire Department approval.
- Adequate public and private fire hydrants shall be required.
- Standard cut-corners will be used on all turns.
- Any roof elevation changes in excess of three feet may require the installation of ships ladders.
- The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.
- All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
- Plans showing areas to be posted and/or painted “FIRE LANE NO PARKING” shall be submitted and approved by the Fire Department prior to building permit application sign-off.
- Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
- All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.
- Helicopter landing facilities are required on all high-rise buildings in the City in accordance with the recently revised Fire Protection Bureau Requirement 10.
- Each standpipe in a new high-rise building shall be provided with two remotely located fire department connections (FDCs) for each zone in compliance with NFPA 14-2013, Section 7.12.2.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase:	Pre-construction; Construction
Monitoring Frequency:	Once at Project plan check; Periodic field inspections
Action Indicating Compliance:	Plan approval and issuance of applicable building permit; Field inspection sign-off; Compliance certification report submitted by Project contractor; Issuance of Certificate of Occupancy

Police Protection

Project Design Features

PDF POL-1: Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the LAPD.

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

PDF POL-2: The Project shall provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. These measures include, but are not limited to, the following:

- Perimeter lighting to supplement the street lighting and to provide increased visibility and security;
- On-site security personnel, commensurate to similar/comparable residential and retail projects of its size, as needed.
- Parking Garage Access Control; and

- Residential Units Access Control.

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

Mitigation Measures

MM POL-1: Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

The perimeter fence shall have gates installed to facilitate the ingress and egress of equipment and the work force. The bottom of the fence, where necessary, shall have filter fabric to prevent silt run off. Straw hay bales shall be utilized around catch basins when located within the construction zone. The perimeter and silt fence shall be maintained while in place. Where applicable, the construction fence shall be incorporated with a pedestrian walkway. Temporary lighting shall be installed and maintained at the pedestrian walkway. Should sections of the site fence have to be removed to facilitate work in progress, barriers and or K-rail shall be utilized to isolate and protect the public from unsafe conditions.

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

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

MM POL-2: The Project Applicant shall provide for the deployment of a private security guard to monitor and patrol the Project Site, appropriate to the phase of construction throughout the construction period. The patrol shall be deployed at times that are typical within the local-area construction industry for a project of this size.

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

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

MM POL-3: The Project Applicant shall provide the LAPD with a diagram of each portion of the Project Site, showing access routes and additional access information as requested by the LAPD, to facilitate police response.

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 Los Angeles Police Department reviewed diagrams; Certificate of Occupancy

Transportation/Traffic

Project Design Features

PDF TR-1: All measures detailed in the Department of Transportation's communication to the Planning Department, dated March 22, 2017, and included in Appendix L-2 to the Draft EIR shall be implemented and complied with. Such communication and mitigation measures are incorporated herein by reference.

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 TR-1: The Project shall develop and implement a Transportation Demand Management (TDM) program to promote non-auto travel, reduce the use of single-occupant vehicle trips, etc. The TDM program shall be subject to review and approval by the City of Los Angeles (Department of City Planning and LADOT). The strategies in the TDM program can include, but are not necessarily limited to, the following:

- Transportation Information Center, educational programs, kiosks and/or other measures
- Promotion and support of carpools and rideshare
- Bicycle amenities such as racks and showers
- Guaranteed ride home (GRH) program
- Incentives for using alternative travel modes
- Parking incentives and administrative support for formation of carpools/vanpools
- On-site TDM coordinator

- Contribution to the City of Los Angeles Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area
- Mobility hub support

The TDM program outlined below details a set of strategies proposed for the Project designed to reduce peak hour vehicular traffic to and from the Project Site. It is a comprehensive program of design features, transportation services, education programs, and incentive programs intended to reduce the impact of traffic from employees and visitors to the Project Site during the most congested time periods of the day. The following provides further information and description of the above-listed TDM program strategies.

Educational Programs. A key component of a successful TDM program is to make residents, employers, and employees at the Project Site aware of the various programs offered. To this end, a TDM coordinator on the building management staff would reach out to residents, employers, and employees directly to promote the benefits of TDM.

A Transportation Information Center is a centrally-located commuter information center where project employees, tenants, and patrons can obtain information regarding commute programs, and individuals can obtain real-time information for planning travel without using an automobile. A Transportation Information Center will support orientation for new residents and employees as well as providing information about transit schedules, commute planning, rideshare, telecommuting, and bicycle and pedestrian plans.

Project Design Features to Promote Bicycling and Walking. A significant and growing number of people in the City prefer to ride bicycles or walk to their employment given sufficient facilities to make the commute feel safe and convenient. The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, a bicycle sharing or rental program, or showers. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians.

The Project would contribute a one-time fixed fee to be deposited into the Bicycle Plan Trust Fund to implement bicycle improvements in the Arts District.

Ridesharing Services and Transportation Assurance Programs. The TDM program would provide services to match employees together to establish carpools and vanpools, and encourage their use by providing a GRH program. Carpools/vanpools provide the potential for employees to come to work relaxed and/or work during the commute and reduce the number of vehicle trips to and from the Project Site. A GRH program assures transportation service to individuals who commute without their

personal automobiles. This program overcomes one of the primary objections of those who could choose alternative modes of transportation, which is how to get home or to a child's school in the case of an emergency. The GRH program would cover all employees participating in the carpool/vanpool program or using transit to and from the Project Site in the event of personal or family emergencies. The individual would be reimbursed for a taxi ride or short-term car rental. A support service such as GRH is an important part of TDM implementation that assures an individual he or she will not be "stuck" depending on a ridesharing or transit schedule in the event of an emergency.

Short-Term Car Rentals. The Project would partner with short-term car rental services such as Zip-Car or Car-to-Go, which would provide vehicles available to users for hourly rentals at strategic locations within the downtown Los Angeles area. Similar to the GRH program, this service offers assurance to users of alternative modes of transit that they have options should the need arise to leave at an unscheduled time. Short-term car rentals can be used to travel to business meetings, lunch, or in emergencies, and can provide the source of emergency transportation for those using the GRH program.

Incentives for Using Alternative Travel Modes. The TDM program could incorporate various incentives for use of its programs. For example, eligible employees could be provided with discounted monthly transit passes for Metro rail and bus service. Carpool and vanpool users could be offered preferential load/unload areas or convenient designated parking spaces. Those who choose not to drive their own cars and park them at the Project Site could receive a "parking cash-out" subsidy, returning a fee that would otherwise cover the cost of parking. Unbundled parking is a program wherein parking spaces are rented separately from the building space, which allows for a separate charge for parking and the flexibility to vary the number of spaces rented. Unbundling parking is an essential first step toward getting people to understand the economic cost of parking. Without unbundled parking, tenants often assume that parking is free.

Mobility Hub Support. The Project would support existing and/or future efforts by LADOT to provide first-mile and last-mile service for transit users through the mobility hub program. Mobility hubs, typically located at or near public transit centers, would provide amenities such as, but not limited to, bicycle parking and rentals, short-term vehicle rentals, and transit information. In cooperation with the proposed Transportation Management Organization (TMO) in the Arts District detailed under Mitigation Measure TR-4 below, the Project could provide space for similar amenities at the Project Site to complement future mobility hubs in the study area.

Bikeway Improvements. The Project would contribute \$100,000 toward the implementation of bicycle improvements within the study area as identified in the 2010 Bicycle Plan and Mobility Plan.

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 TR-2: The Project Applicant shall initiate, fund, and market an Arts District Transportation Management Organization (TMO)/Arts District portion of a Downtown TMO to oversee the development, implementation, and operation of TDM strategies and help alleviate current and future traffic congestion throughout the area. The TMO services shall be available to anyone within the general Arts District community, not just residents and tenants of the Proposed Project. The Project Applicant shall agree to initiate and provide seed funding for either the Arts District TMO or the Arts District portion of a Downtown TMO following approval of the Proposed Project by funding TMO operations and marketing efforts. While the City of Los Angeles is still in the early stages of establishing the Downtown/Arts District TMO, similar TMO organizations in Los Angeles have initial budgets of \$200,000 to set up and run the first year and an additional \$100,000 to maintain and operate each year thereafter. These costs include development of the TMO, the salary of a part-time TMO manager, and marketing. The Project Applicant shall commit the \$200,000 required in the first year to cover the cost of launching the Arts District TMO/Arts District portion of a Downtown TMO and shall commit to nine additional years (10 years in total) as a charter member at annual dues of \$25,000. It is anticipated that with almost 30 projects proposed for the Arts District, other major projects will want to join the TMO and participate in the trip-reducing programs of the organization.

A TMO is an organization that oversees the development, implementation, and operation of TDM strategies within a particular study area. Developers, building owners, and businesses are members of the TMO, paying annual dues to support the activities of the TMO. The City of Los Angeles is in the process of forming a Downtown Los Angeles TMO and there is discussion as to whether the TMO would treat downtown Los Angeles as one study area or whether the area would be divided into separate districts. Under either approach, the Arts District would be covered by a TMO.

The Arts District community is a strong candidate for alternative modes of transportation, including walking and bicycling, carpooling and vanpooling, use of public transit, short-term automobile rentals, etc. At present, there is no organization to administrate and promote these options to the public. The Downtown/Arts District TMO would be an organization that helps to promote these services to the community by providing information about available public transportation options and matching people into ridesharing services.

Travel analyses in urban Los Angeles show that more than half of the trips within a specific urban zone have a trip length of less than five miles. Therefore, approximately 50 percent of trips in the Downtown/Arts District TMO area have the potential to be directly reduced by the TMO programs. The Downtown/Arts District TMO is expected to approach the levels of effectiveness of the Warner Center, Century City, and Burbank TMOs in that it will reduce the number of trips originating or ending within the Arts District TMO area. To this end, over the next two decades, it could reduce single-passenger automobile trips by as much as 15 percent while increasing transit ridership, use of ridesharing, and non-automotive modes of transportation such as walking and bicycling.

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 TMO; annual consistency review

MM TR-3: The Applicant shall consult with Caltrans in order to determine and provide its fair share contribution toward the funding of off-ramp improvements necessary to increase the storage length on the three off-ramps where Project-generated traffic would contribute to forecast traffic volumes in excess of available ramp storage capacities.

Enforcement Agency:	Caltrans; Los Angeles Department of Transportation
Monitoring Agency:	Caltrans; Los Angeles Department of Transportation

Monitoring Phase:	Prior to occupancy
Monitoring Frequency:	Once prior to issuance of final Certificate of Occupancy
Action Indicating Compliance:	Caltrans sign-off on fair share payment

Wastewater

Project Design Features

PDF WW-1: In the event of full or partial public street closures necessary to install new sewer lines, the relevant components of the Project's Construction Management Plan shall be implemented.

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

Water

Project Design Features

PDF WAT-1: In the event of full or partial public street closures, such as during the construction of new water lines, the Construction Traffic Management Plan shall be implemented.

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

PDF WAT-2: The Project design shall include, at a minimum, the water conserving features identified in Table II (on page 9) of the Water Supply Assessment prepared by LADWP for the Project.

Enforcement Agency:	Los Angeles Department of Building and Safety
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Monitoring Agency:	Los Angeles Department of Building and Safety
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Monitoring Phase:	Pre-construction; Construction
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Monitoring Frequency:	Once at Project plan check; Periodic field inspections
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Action Indicating Compliance:	Plan approval and issuance of applicable building permit; Field inspection sign-off; Compliance certification report submitted by Project contractor; Issuance of Certificate of Occupancy
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Energy Conservation

Project Design Features

PDF EN-1: The Project shall use Energy Star appliances where available.

Enforcement Agency:	Los Angeles Department of Building and Safety
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Monitoring Agency:	Los Angeles Department of Building and Safety
Monitoring Phase:	Construction
Monitoring Frequency:	Once prior to issuance of final Certificate of Occupancy
Action Indicating Compliance:	Issuance of Certificate of Occupancy