

IV. Mitigation Monitoring and Reporting Program

IV. MITIGATION MONITORING AND REPORTING PROGRAM

1. Introduction

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

The Housing Authority of the City of Los Angeles is the Lead Agency for the Project and is therefore responsible for administering and implementing the MMRP. 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 implementation of mitigation measures in accordance with the MMRP.

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 (PDFs) and applies mitigation measures (MMs) needed to avoid or reduce potentially significant environmental impacts. This MMRP allows for monitoring implementation of the PDFs and MMs required for the Project.

2. Organization

As shown on the following pages, each identified PDF and MM for the Project is organized by environmental impact area, with the following details:

- Responsible Party—the party that is responsible for implementing the project design feature or mitigation measure.
- Monitoring Party—the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Implementation Stage—the phase of the Project during which mitigation measure shall be monitored.

3. Administrative Procedures and Enforcement

This MMRP shall be enforced throughout all phases of the Project, as applicable. The project Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the applicable monitoring and enforcement agencies. Furthermore, the Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City of Los Angeles 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),

approved by the Housing Authority of the City of Los Angeles, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMRP.

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

4. Program Modification

After review and approval of the final MMRP by the Lead Agency, minor changes and modifications to the MMRP are permitted, but can only be made subject to approval by the Lead Agency. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMRP and the need to protect the environment. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

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

5. Mitigation Monitoring and Reporting Program

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
PROJECT DESIGN FEATURES				
Air Quality				
Construction Equipment Permitting and Registration	AQ-PDF-1 The construction contractor may only use equipment permitted (where permits are required) by the South Coast Air Quality Management District or registered (where registration is required) under the California Air Resources Board’s Portable Equipment Registration Program when used for contaminated soil removal and transport, and for project demolition and construction.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Greenhouse Gas Emissions				
Energy Conservation and Efficiency	GHG-PDF-1 Project design will provide an energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements, based on the 2016 Building Energy Efficiency Standards requirements. ¹	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Energy Conservation and Efficiency	GHG-PDF-2 Use of high-efficiency Energy Star appliances, where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-3 Inclusion of water conservation measures in accordance with the Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping).	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF

¹ For analysis purposes, a value of 10% more efficient than Title 24 was used in the CalEEMod model.

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

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Water Conservation	GHG-PDF-4 Use of drought-tolerant plants and indigenous species, stormwater collection, permeable pavement wherever possible, and stormwater filtration, storage and re-use for landscaping.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-5 Use of high-efficiency toilets, including dual-flush water closets, as appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-6 Use of high-efficiency showerheads at 1.5 gallons per minute. Install no showers with multiple showerheads.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-7 Use of high-efficiency Energy Star appliances, where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-8 Use of weather-based irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/micro spray/subsurface irrigation where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-9 Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-10 Use of proper hydro-zoning and turf minimization, as feasible.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Quality	GHG-PDF-11 Installation of pre-treatment stormwater infrastructure for the stormwater treatment system.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

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Water Quality	GHG-PDF-12 Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site and/or on the structure.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Air Quality	GHG-PDF-13 Prohibit the use of any fireplaces in the proposed residential units.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Recreation and Parks				
Recreation and Parks	Recreation and Parks PDF-1 Not less than 90 days prior to the anticipated construction completion the Project Applicant will reach out to the City of Los Angeles Department of Recreation and Parks staff responsible for the programming (if any) at various neighborhood, community, and regional parks located within a 2-mile radius of the Project site to consider mutually beneficial partnership between park programs, operations, and improvements. These parks and recreation facilities include, but are not limited to, El Sereno Arroyo Playground, El Sereno Community Gardens, Henry Alvarez Memorial Park, Hermon Dog Park, Hermon Park, Arroyo Seco Park, Carlin G. Smith Recreation Center, Cypress Recreation Center, Cypress Recreation Center, Downey Recreation Center, Ascot Hills Park and Charles F. Lummis Home.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Energy				
Thresholds 4.15.3.3 (a) and (b): (a): Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy	Refer to Project Design Features listed above, which are reproduced under Greenhouse Gases: GHG-PDF-1 through GHG-PDF-10 above.	Refer to GHG-PDF-1 through GHG-PDF-10 above.	Refer to GHG-PDF-1 through GHG-PDF-10 above.	Refer to GHG-PDF-1 through GHG-PDF-10 above.

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resources, during Project construction or operation? (b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				
MITIGATION MEASURES				
Aesthetics				
Threshold 4.1.3.3 (b): <i>Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</i>	Refer to Mitigation Measures CUL-1 and CUL-2 below.	Significant and Unavoidable regarding Historic Architectural Resources	Refer to MM CUL-1 and CUL-2 below.	Refer to MM CUL-1 and CUL-2 below.
Biological Resources				
Threshold 4.3.3.3 (a): <i>Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.?</i>	MM BR-1: Nesting Bird Surveys If Project activities begin during nesting bird season (generally February 1 – August 31), no earlier than one week prior to ground-disturbing activities, a qualified biologist shall conduct preconstruction nesting bird clearance surveys within the Project Site and within a 100-foot buffer around the Project Site for nesting birds, and other sensitive species. To maintain compliance with the Migratory Bird Treaty Act and California Fish and Game Code, and to avoid or minimize direct and indirect effects on migratory non-	Less Than Significant	Project Applicant/ The Housing Authority of the City of Los Angeles (HACLA)	Prior to commencement of Project construction and throughout the duration of construction activities that result in tree or vegetation removal

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	<p>game nesting birds, and their nests, young, and eggs, the following measures shall be implemented.</p> <ul style="list-style-type: none"> • Project activities that will remove or disturb potential nest sites should be scheduled outside the nesting bird season, if feasible. The nesting bird nesting season is typically from February 1 through August 31, but can vary slightly from year to year, usually depending on weather conditions. Raptors are known to begin nesting early in the year and ends late. The raptor nesting bird season begins January 1 to September 15. • If Project activities that will remove or disturb potential nest sites cannot be avoided during February 1 through August 31, a qualified biologist shall conduct a pre-construction survey for nesting birds within the limits of Project disturbance up to seven days prior to mobilization, staging and other disturbances. Preconstruction surveys shall be conducted no more than three days prior to vegetation, substrate, and structure removal and/or disturbance. • If neither nesting birds nor active nests are observed during the pre-construction survey(s), or if they are observed and will not be affected (i.e. outside the buffer zone described below), then Project activities may begin and no further nesting bird monitoring will be required. • If an active bird nest is located during the pre-construction survey and will potentially be affected, a no-activity buffer zone shall be delineated on maps and marked in the field by fencing, stakes, flagging, or other means up to 500 feet for raptors, or 100 feet for non-raptors. Materials used to demarcate the nests will be 			

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	<p>removed as soon as work is complete or the fledglings have left the nest. The biologist will determine the appropriate size of the buffer zone based on the type of activities planned near the nest and bird species. Buffer zones shall not be disturbed until a qualified biologist determines that the nest is inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, or the young will no longer be affected by Project activities. Periodic monitoring by a biologist will be performed to determine when nesting is complete. After the nesting cycle is complete, Project activities may begin within the buffer zone.</p>			
<p>Threshold 4.3.3.3 (a): <i>Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</i></p>	<p>MM BR-2: Biological Monitor</p> <ul style="list-style-type: none"> The applicant shall retain a qualified Biological Monitor to conduct pre-construction surveys and biological monitoring during construction. If special-status wildlife species or protected nesting birds are observed and determined present within the BSA during the pre-construction breeding bird surveys, then the qualified biological monitor shall be onsite to monitor throughout the duration of construction activities that result in tree or vegetation removal, to minimize the likelihood of inadvertent impacts on nesting birds and other wildlife species. Monitoring shall also be conducted periodically during construction activities to ensure no new nests occur during vegetation removal or building demolition activities between February 1 through August 31. The biological monitor shall ensure that biological mitigation measures, best management practices, avoidance, and protection measures and mitigation measures described in the 	<p>Less Than Significant</p>	<p>Project Applicant/HACLA</p>	<p>If Project activities begin during nesting bird season (generally February 1 – August 31), no later than one week prior to ground-disturbing activities</p>

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>relevant project permits and reports are in place and are adhered to.</p> <ul style="list-style-type: none"> The Biological Monitor shall have the authority to halt all construction activities and all non-emergency actions if sensitive species and/or nesting birds are identified and would be directly impacted. The monitor will notify the appropriate resource agency and consult if needed. If necessary, the monitoring biologist shall relocate the individual outside of the work area where it will not be harmed. Work can continue at the location if the applicant and the consulted resource agency determine that the activity will not result in impacts on the species. The appropriate agencies shall be notified if a dead or injured protected species is located within the Project Site. Written notification shall be made within 15 days of the date and time of the finding or incident (if known) and must include: location of the carcass, a photograph, cause of death (if known), and other pertinent information. 			
Cultural Resources				
<p>Threshold 4.4.3.3 (a): <i>Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?</i></p>	<p>MM CUL-1: The Project Applicant shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction is complete. It shall include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description</p>	<p>Significant and Unavoidable regarding Historic Architectural Resources</p>	<p>Project Applicant/HACLA and HCID</p>	<p>After Project construction is complete</p>

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>of the Undertaking which led to the demolition of the historic property. The display shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards for History or Architectural History. HCID shall ensure that the Project Applicant has satisfactorily completed the interpretive display as described in this stipulation and submit the draft content to SHPO for review and approval. SHPO shall have 30 days to review the interpretive display content before it is produced and installed. (This is PA Stipulation I.A.)</p>			
<p>Threshold 4.4.3.3 (a): <i>Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?</i></p>	<p>MM CUL-2: HACLA shall add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months from the issuance of the Certificate of Occupancy for the Rose Hill Courts Redevelopment Project. The website shall provide content on the history of the agency, the significance of public housing in the City, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of public housing. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the SOI Professional Qualifications Standards for History or Architectural History. HCID shall ensure that HACLA has satisfactorily completed the new website section as described in this stipulation and submit the draft content to SHPO for review and approval. SHPO shall have thirty (30) days to review the content before it is published. Once the new</p>	<p>Significant and Unavoidable regarding Historic Architectural Resources</p>	<p>HACLA/HCID</p>	<p>Within six months of completing the Rose Hill Courts Redevelopment Project</p>

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	website section is complete, HACLA shall publicize it in its monthly newsletter. (This is PA Stipulation I.B.)			
Geology and Soils				
<p>Thresholds 4.5.3.3 (a) ii and iii, (c), and (d).</p> <p>Threshold 4.5.3.3 (a): <i>Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</i></p> <p><i>ii) Strong seismic ground shaking?</i></p> <p><i>iii) Seismic-related ground failure, including liquefaction?</i></p> <p>Threshold 4.5.3.3 (c): <i>Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?</i></p> <p>Threshold 4.5.3.3 (d): <i>Would the project be located on expansive soil, as defined in Table 18.1 B</i></p>	<p>MM GEO-1: Prior to issuance of grading permits, the Applicant shall submit final design plans and a final design-level geotechnical report to the Los Angeles Department of Building and Safety for review and approval. The design-level geotechnical report shall be used for final design of the foundation system for the structures and shall take into consideration the engineering properties beneath the proposed structures and the projected loads. The final report shall specify geotechnical design parameters that are needed by structural engineers to determine the type and sizing of structural building materials. The final report shall be subject to the specific performance criteria imposed by all applicable state and local codes and standards. The final geotechnical report shall be prepared by a registered civil engineer or certified engineering geologist and include appropriate measures to address seismic hazards and ensure structural safety of the proposed structures. The proposed structures shall be designed and constructed in accordance with all applicable provisions of the California Building Code and the Los Angeles Building Code. The design-level geotechnical report shall address each of the recommendations provided in the Geotechnical Investigation Report prepared by Geocon West Inc. (Geocon, 2019; Appendix J); dated</p>	Less Than Significant		

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<p><i>of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?</i></p>	<p>May 16, 2018 (Revised January 2019), including, but not limited to the following:</p> <ul style="list-style-type: none"> • Grading, shoring and foundation plans shall be reviewed by the Geotechnical Engineer prior to finalization to verify that the plans have been prepared in substantial conformance with the recommendations of the Geotechnical Investigation Report (Geocon, 2019) and to provide additional analyses or recommendations. • Based on the final foundation loading configurations, the potential for settlement shall be reevaluated. • All excavations shall be observed and approved in writing by the Geotechnical Engineer. Prior to placing any fill, the excavation bottom shall be proof-rolled with heavy equipment in the presence of the Geotechnical Engineer. • All onsite excavations shall be conducted in such a manner that potential surcharges from existing structures, construction equipment, and vehicle loads are resisted. The surcharge area shall be defined by a 1:1 projection down and away from the bottom of an existing foundation or vehicle load. Penetrations below this 1:1 projection shall require special excavation measures such as sloping or shoring. • As a minimum, the upper 5 feet of existing earth materials within the proposed building footprint areas shall be excavated and properly compacted for foundation and slab support. Deeper excavations shall be 			

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>conducted as necessary to remove existing artificial fill or soft alluvial soil at the direction of the Geotechnical Engineer. Proposed building foundations shall be underlain by a minimum of 3 feet of newly placed engineered fill. The excavation shall extend laterally a minimum distance of 3 feet beyond the building footprint areas, including building appurtenances, or a distance equal to the depth of fill below the foundation, whichever is greater.</p> <ul style="list-style-type: none"> • Due to the expansive potential of the subgrade soils, the moisture content in the slab and foundation subgrade shall be maintained at 2 percent above optimum moisture content prior to and at the time of concrete placement. • After finish pad grades have been achieved, laboratory testing of the subgrade soil shall be performed to confirm the corrosivity characteristics of the soils. • To minimize or avoid the potential for concrete or metal corrosion in onsite soils, a corrosion engineer shall be retained prior to construction to evaluate corrosion test results and incorporate any necessary precautions into project design. • Concrete mix design shall be reviewed by a qualified corrosion engineer to evaluate the general corrosion potential of the soils on the Project Site. • Buried metallic structures and elements shall be designed with corrosions protection 			

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

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	<p>as determined by a qualified corrosion engineer.</p> <ul style="list-style-type: none"> • Project Site soils shall be evaluated for expansion in the final geotechnical report. • All surface water shall be diverted away from excavations. • Waterproofing of subterranean walls and slabs shall be required to prevent moisture intrusion and water seepage. Particular care shall be taken in the design and installation of waterproofing to avoid moisture problems, or actual water seepage into the structure through any normal shrinkage cracks which may develop in the concrete walls, floor slab, foundations and/or construction joints. • A waterproofing consultant shall be retained in order to recommend a product or method, which would provide protection to subterranean walls, floor slabs and foundations. • Back-drains, if utilized, shall be designed per the recommendations of the final geotechnical report. • Sub-drainage pipes at the base of the retaining wall drainage system shall outlet to an acceptable location via controlled drainage structures. Drainage shall not be allowed to flow uncontrolled over descending slopes. 			

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	<ul style="list-style-type: none"> • Retaining walls shall include a drainage system extended at least two-thirds the height of the wall. At the base of the drain system, a subdrain covered with a minimum of 12 inches of gravel shall be installed, and a compacted fill blanket or other seal placed at the surface. The clean bottom and subdrain pipe, behind a retaining wall, shall be observed by the Geotechnical Engineer prior to placement of gravel or compacting backfill. • Wall backfill specifications (e.g., material gradation, compaction requirements, etc.), and surcharge conditions shall be designed per the recommendations of final geotechnical report. • Walls shall be properly drained to prevent buildup of hydrostatic pressures behind walls or be designed to withstand hydrostatic pressures. • Seismic lateral forces shall be incorporated into the design as necessary. The structural engineer shall determine the seismic design category for the project in accordance with Section 1613 of the CBC. If the project possesses a seismic design category of D, E, or F, proposed retaining walls in excess of 6 feet in height should be designed with seismic lateral pressure (Section 1803.5.12 of the 2016 CBC). • The results of the percolation testing shall be evaluated by the project civil engineer to determine if a stormwater infiltration system is required. 			

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	<ul style="list-style-type: none"> • All site drainage shall be collected and controlled in non-erosive drainage devices. Drainage shall not be allowed to flow uncontrolled over any descending slope or pond anywhere on the site, and especially not against any foundation or retaining wall. • Positive site drainage shall be provided away from structures, pavement, and the tops of slopes to swales or other controlled drainage structures. The building pad and pavement areas shall be fine graded such that water is not allowed to pond. Discharge from downspouts, roof drains, and scuppers shall not occur onto unprotected soils within 5 feet of the building perimeter. Planters located adjacent to foundations shall be sealed to prevent moisture intrusion into the soils providing foundation support. 			
<p>Threshold 4.5.3.3 (f): <i>Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i></p>	<p>MM PALEO-1: A qualified paleontologist (approved by the City or County of Los Angeles, as applicable, and the Los Angeles County Natural History Museum Vertebrate Paleontology Department) shall be retained prior to excavation and grading activities at the Project Site.</p> <ul style="list-style-type: none"> • Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and shall include, but not be limited to, monitoring of ground disturbance activities in sediments that are likely to 	Less Than Significant	Project Applicant/HACLA	Project grading/construction

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final compliance report that would provide details of monitoring, fossil identification, and repository arrangements. The Project Applicant shall then comply with the recommendations of the Project paleontologist and requirements of the PRIMP.</p> <ul style="list-style-type: none"> • Before the mitigation program begins, the paleontologist or monitor shall coordinate with the appropriate construction contractor personnel to provide information regarding City or County of Los Angeles requirements, as applicable, for the protection of paleontological resources. Contractor personnel shall be briefed on procedures to be followed in the event that fossil remains and a previously unrecorded fossil site are encountered by earth-moving activities, particularly when the monitor is not on site. • The qualified paleontologist shall perform periodic inspections of excavation and grading activities at the Project Site to determine the presence of fossiliferous soils. The frequency and location of inspections shall be specified in the PRIMP and shall depend on the depth of excavation and grading activities and the materials being excavated. When Puente Formation sediments (known to contain 			

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	<p>Miocene marine fossils) are encountered (generally at depths of 11 to 16 feet or more at the Project site) the paleontologist shall monitor full time during excavation. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. A copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.</p>			
Hazards and Hazardous Materials				
<p>Threshold 4.7.3.3 (b): <i>Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</i></p>	<p>MM HAZ-1: Due to the presence of lead in the soil at the Project Site, a Soil Management Plan (SMP) shall be prepared. Prior to the commencement of grading and excavation, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP that complies with all applicable regulatory requirements. The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall contain the following:</p> <ul style="list-style-type: none"> • The recommendations of the HHMD and LAFD. • The SMP shall require that the Project Applicant remove and properly dispose of impacted materials in accordance with 	<p>Less Than Significant</p>	<p>Project Applicant/City of Los Angeles Department of Building and Safety</p>	<p>Prior to the submittal of building plans to the City of Los Angeles Department of Building and Safety</p>

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	<p>applicable requirements of the DTSC, County of Los Angeles Fire Department and the South Coast Air Quality Management District.</p> <ul style="list-style-type: none"> • The SMP shall require that contaminated soils be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/ treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. • The SMP shall be implemented during excavation and grading activities. • A qualified environmental consultant shall be present on the Project Site during grading and excavation activities in the known or suspected locations of contaminated soils, and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination. 			

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<p>Threshold 4.7.3.3 (b): <i>Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</i></p>	<p>MM HAZ-2: Prior to issuance of the Building Permit(s), the Project Applicant shall consult with the City of Los Angeles Department of Building and Safety regarding radon at the Project Site. After construction of each Phase, radon testing shall be conducted on the Project Site to confirm if radon concentrations in the new buildings on the Project Site exceed the USEPA action level of 4.0 pCi/L. The results of the radon tests shall be provided to the City of Los Angeles Department of Building and Safety. The Project Applicant shall implement any recommendations from the City of Los Angeles Department of Building and Safety regarding radon.</p>	<p>Less Than Significant</p>	<p>Project Applicant / City of Los Angeles Department of Building and Safety</p>	<p>Prior to the submittal of building plans to the City of Los Angeles Department of Building and Safety</p>
Noise				
<p>Threshold 4.10.3 (a): <i>Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i></p>	<p>MM N-1: The construction contractor will conduct noise monitoring near sensitive receivers identified for this Project, during the suspected noise producing construction activities. During times that active construction equipment is within 200 feet of a residence or other sensitive receiver, noise measurements will be taken for at least three 15-minute periods per hour for two hours. If the monitored noise levels exceed background (ambient) noise levels by 5 dB or feet of a residence or other sensitive receiver for two or more 15-minute periods per hour, then the construction contractor will mitigate noise levels using temporary noise shields, noise barriers or other mitigation measures to comply with those restrictions or standards. (See mitigation measures N-2 and N-3 below.)</p>	<p>Potentially Significant sometimes during Project construction</p>	<p>Project Applicant/HACLA and City of Los Angeles Planning Department</p>	<p>During Project construction</p>
<p>Threshold 4.10.3 (a): <i>Would the Project result in generation of a substantial temporary or permanent increase in</i></p>	<p>MM N-2: The construction contractor will use the following source controls, in response to complaints and/or when ambient noise monitoring of complainant's exposure shows that noise from construction exceeds ambient</p>	<p>Potentially Significant sometimes during Project construction</p>	<p>Project Applicant/HACLA and City of Los Angeles Planning Department</p>	<p>During Project construction</p>

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<p><i>ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i></p>	<p>levels by at least 5 dBA, except where not physically feasible:</p> <ul style="list-style-type: none"> • Use of noise producing equipment will be limited to the interval from 8:00 a.m. to 5:00 p.m., Monday through Friday. • For all noise producing equipment, use types and models that have the lowest horsepower and the lowest noise generating potential practical for their intended use. • The construction contractor will ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately. • Have only necessary equipment on site. • Use manually adjustable or ambient sensitive backup alarms. 			

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<p>Threshold 4.10.3 (a): <i>Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i></p>	<p>MM N-3: The contractor will use the following path controls, in response to complaints and when ambient noise monitoring of complainant's exposure shows exceedance of local standards, except where not physically feasible:</p> <ul style="list-style-type: none"> • Install portable noise barriers, including solid structures and noise blankets, between the active noise sources and the nearest noise receivers. • Temporarily enclose localized and stationary noise sources. • Store and maintain equipment, building materials and waste materials as far as practical from as many sensitive receivers as practical. 	<p>Potentially Significant sometimes during Project construction</p>	<p>Project Applicant/HACLA and City of Los Angeles Planning Department</p>	<p>During Project construction</p>
<p>Threshold 4.10.3 (a): <i>Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i></p>	<p>MM N-4: Advance notice of the start of construction shall be delivered to all noise sensitive receivers adjacent to the Project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the City.</p>	<p>Potentially Significant sometimes during Project construction</p>	<p>Project Applicant/HACLA and City of Los Angeles Planning Department</p>	<p>During Project construction</p>

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<p>Threshold 4.10.3 (a): <i>Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i></p>	<p>MM N-5: Before issuance of a building permit, the building contractor shall prepare, and the City shall review and approve, a Construction Noise Control Plan. The plan shall include and describe in detail how mitigation measures N-1 through N-4 will be implemented.</p>	<p>Significant and Unavoidable sometimes during Project construction</p>	<p>Project Applicant/HACLA and City of Los Angeles Planning Department</p>	<p>During Project construction</p>
Public Services - Police Protection				
<p>Threshold 4.11.b.3.1 (a): <i>Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Police protection?</i></p>	<p>MM PS-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.</p>	<p>Less than significant</p>	<p>Project Applicant/HACLA</p>	<p>Prior to the commencement of Project construction</p>

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<p>Threshold 4.11.b.3.1 (a): <i>Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Police protection?</i></p>	<p>MM PS-2: Project plans shall incorporate the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the LAPD relative to security, semi public and private spaces, which may include but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high foot-traffic areas. These measures shall be approved by the City of Los Angeles Police Department prior to the issuance of building permits.</p>	<p>Less than significant</p>	<p>Project Applicant/HACLA and City of Los Angeles Police Department</p>	<p>Prior to the issuance of building permits by the City of Los Angeles</p>
Public Services - Recreation and Parks				
<p>Threshold 4.11.d.3.3 (a), (b) and (c): <i>(a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios,</i></p>	<p>MM PS-3: During Project construction the construction contractor shall ensure that access to Rose Hill Recreation Center, Rose Hill Park, and Ernest Debs Regional park is maintained for the public. If access to these facilities is temporarily blocked off during construction, the construction contractor shall ensure that an alternate route is available for public access and the contractor shall provide signs clearly marking the alternate route to the park/recreation facilities.</p>	<p>Less than significant</p>	<p>Project Applicant/HACLA</p>	<p>During Project construction</p>

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<p><i>response times or other performance objectives for parks?</i></p> <p>Threshold (b): <i>Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</i></p> <p>Threshold (c): <i>Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</i></p>				

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Transportation				
<i>Threshold 4.15.3 (a): Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</i>	MM TRANS-1: Prior to the commencement of Project construction, the Project Applicant for the Project will submit a detailed Construction Management Plan (with copy to HACLA) to be reviewed and approved by LADOT. In the Construction Management Plan, it will specify that the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas must be included in the Construction Management Plan.	Less than significant	Project Applicant/ City of Los Angeles	Prior to issuance of a demolition permit
<i>Threshold 4.15.3 (a): Would the Project conflict with a program plan, ordinance or policy address the circulation system, including transit, roadway, bicycle and pedestrian facilities?</i>	MM TRANS-2: Prior to issuance of a demolition permit, the Project applicant shall submit to the City of Los Angeles Planning Department (with copy to HACLA) and the Planning Department shall approve a construction management schedule. The schedule shall include a street closure plan that details how vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic will flow during temporary street closures during both Phase I and Phase II of Project construction.	Less than significant	Project Applicant/ City of Los Angeles Department of City Planning	Prior to issuance of a demolition permit
<i>Threshold 4.15.3 (c): Would the Project result in inadequate emergency access?</i>	MM TRANS-3: Prior to issuance of a grading permit, the Project applicant shall submit to the City of Los Angeles Department of City Planning (with copy to HACLA) a construction management schedule that details truck traffic and employee shifts to avoid creating trips during the PM peak period. The schedule will specify that all truck trips shall be completed before 3:00 p.m. each day to avoid both employee and truck trips being generated during the PM peak period.	Less than significant	Project Applicant/City of Los Angeles Department of City Planning	Prior to issuance of a grading permit