IV. Mitigation Monitoring and Reporting Program

1. Introduction

Section 21081.6 of the Public Resources Code 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." Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting. As the lead agency for the Project, Metro is responsible for administering and implementing the Mitigation Monitoring and Reporting Program (MMRP). The decisionmakers must define specific monitoring requirements to be enforced during project implementation. The primary purpose of the MMRP is to ensure that the project design features (PDFs) and mitigation measures (MMs) identified in the Draft and Final EIR are implemented, effectively minimizing the identified environmental effects.

2. Organization

As shown in Section 4 Mitigation Monitoring and Reporting Program below, each identified PDF and MM for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Monitoring Action: The criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.
- Responsible Party: The entity accountable for the action.
- Enforcement Agency: The agency or agencies responsible for overseeing the implementation of mitigation.
- Monitoring Phase: The timing of when implementation of the action is verified.

3. 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 Metro

approval. 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 in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may 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, and that the modification will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact consistent with the requirements of CEQA. 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 for Metro as the Lead Agency 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.

4. Mitigation Monitoring and Reporting Program

Table IV-1
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
Aesthetics				
Project Design Feature AES-PDF-1: State of the art louvers or other equivalent design features shall be incorporated into the design of TCN Structures FF-13, FF-14, FF-25, FF-29, and FF-30 such that the light trespass illuminance at sensitive habitat at the proposed Bowtie State Park, at the mapped biological resources in the vicinity of TCN Structure FF-25, and at the Ballona Wildlife Reserve to the south of the Marina Freeway, west of Culver Boulevard, do not exceed 0.02 footcandles.	Incorporate louvers or other equivalent design features into the design	Construction Contractor	Metro	Preconstruction; Construction
Air Quality				
Project Design Feature AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators will be used during construction.	Use power poles and/or solar powered generators where feasible	Construction Contractor	Metro and/or City of Los Angeles	Preconstruction; Construction
Biological Resources				
Mitigation Measure BIO-MM-1: Implement Biological Resource Protection Measures during Construction (All Site Locations and takedown locations of existing static displays). The following BMPs shall be implemented during construction to minimize direct and indirect impacts on biological resources and special-status species: • Prior to the commencement of construction, a Project biologist (a person with, at minimum, a bachelor's degree in biology, ecology, or a related environmental science; greater than five years of experience and knowledge of natural history, habitat affinities, and id of flora and fauna species; and knowledge of all relevant federal, state, and local laws governing biological resources, including CDFW qualifications for field surveyors) shall be designated to be responsible for overseeing compliance with protective measures for biological resources during vegetation clearing and work activities within and adjacent to areas of native habitat. The Project biologist will be familiar with the local habitats, plants, and wildlife and maintain communications with the contractor on issues relating to biological resources and compliance with applicable environmental requirements. The Project biologist may designate other qualified biologists or biological monitors to help oversee Project compliance or conduct preconstruction surveys for special-status species. These biologists will have familiarity with the species for which they would be conducting preconstruction surveys or monitoring construction activities. • The Project biologist or designated qualified biologist shall review final plans; designate areas that need temporary fencing (e.g., ESA fencing); and monitor construction activities within and adjacent to areas with native vegetation communities, regulated aquatic features, or special-status plant and wildlife species. The qualified biologist shall monitor compliance with applicable environmental requirements during construction activities within designated areas during critical times, such as initial ground-disturbing activities (fencing to protect native species). The qualified biologist shall check construction barriers	Retain a qualified biologist.	Construction Contractor	Metro	Preconstruction; Construction
	Conduct a Worker Environmental Awareness Program for all Project personnel and contractors who will be on the Site Locations.	Construction Contractor/Qualified Biologist	Metro	Preconstruction; Construction
	Conduct a preconstruction survey for special-status species.	Construction Contractor/Qualified Biologist	Metro	Preconstruction; Construction
	Inspect the Site Location footprint immediately prior to, and during construction to identify the presence of invasive weeds.	Construction Contractor/Qualified Biologist	Metro	Preconstruction; Construction
	Designate areas that need temporary fencing (e.g., ESA fencing); and monitor construction activities within and adjacent to areas with native vegetation communities, regulated aquatic features, or special-status plant and wildlife species.	Construction Contractor/Qualified Biologist	Metro	Preconstruction; Construction
	Incorporate contractor responsibilities into applicable construction documents including plans and specifications.	Construction Contractor/Qualified Biologist	Metro	Preconstruction; Construction

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
or exclusion fencing and provide corrective measures to the contractor to ensure the barriers or fencing are maintained throughout construction. The qualified biologist shall have the authority to stop work if a federally or state-listed species is encountered within the Project footprint during construction. Construction activities shall cease until the Project biologist or qualified biologist determines that the animal will not be harmed or that it has left the construction area on its own. The Project biologist shall notify Metro, and Metro shall notify the appropriate regulatory agency within 24 hours of sighting of a federally or State-listed species. • Prior to the start of construction, all Project personnel and contractors who will be on the Site Locations during construction shall complete mandatory training conducted by the Project biologist or a designated qualified biologist. Any new Project personnel or contractors that start after the initiation of construction shall also be required to complete the mandatory Worker Environmental Awareness Program training before they commence with work. The training shall advise workers of potential impacts on special-status vegetation communities and special-status species and the potential penalties for impacts on such vegetation communities and species. At a minimum, the training shall include the following topics: (1) occurrences of special-status species and special-status vegetation communities within the Site Location footprints (including vegetation communities subject to USACE, CDFW, and RWQCB jurisdiction); (2) the purpose for resource protection; (3) sensitivity of special-status species to human activities; (4) protective measures to be implemented in the field, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced areas to avoid special-status resource areas in the field (i.e., avoided areas delineated on maps or in the BSA by fencing); (5) environmentally responsible construction practices; (6) the protocol to resolve conflicts that may arise at any time during the construction process; (7) reporting requirements and procedures to follow should a special-status species be encountered during construction; and (8) Avoidance Measures designed to reduce the impacts on special-status species. • The training program will include color photos of special-status species and special-status vegetation communities. Following the education program, the photos will be made available to the contractor. Photos of the habitat in which special-status species are found will be posted on site. The contractor shall provide Metro with evidence of the employee training (e.g., a sign-in sheet) on request. Project personnel and contractors shall be instructed to immediately notify the Project biologist or designated biologist of any incidents that could affect special-status vegetation communities or special-status species. Incidents could include fuel leaks or injury to any wildlife. The Project biologist shall notify Metro of any incident, and Metro shall notify the appropriate regulatory agency. • The Project biologist shall conduct a preconstruction survey for special-status species within the Project footprint prior to vegetation clearing, and/or ground disturbance. Any wildlife encountered will be encouraged to leave the Site Location footprint or relocated outside of the Site Location footprint if feasible. • The Project biologist shall request that the contractor halt work, if necessary,				

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
and confer with Metro prior to contacting the appropriate regulatory agencies to ensure the proper implementation of species and habitat protection measures. The Project biologist shall report any noncompliance issue to Metro, and Metro will notify the appropriate regulatory agencies. • The Project biologist shall inspect the Site Location footprint immediately prior to, and during construction to identify the presence of invasive weeds and recommend measures to avoid their inadvertent spread in association with the Project. Such measures may include inspection and cleaning of construction equipment and use of eradication strategies. • ESA fencing shall be placed along the perimeter of the Site Location footprint, where necessary, to prevent inadvertent intrusions into habitat identified as ESA. Work areas will be clearly marked in the field and confirmed by the Project biologist or designated biologist prior to any clearing, and the marked boundaries will be maintained throughout the duration of the work. Staging areas, including lay down areas and equipment storage areas, will be flagged and fenced with ESA fencing (e.g., orange plastic snow fence, orange silt fencing). Fences and flagging will be installed by the contractor in a manner that does not impact habitats to be avoided and such that it is clearly visible to personnel on foot and operating heavy equipment. If work occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of Metro. • No work activities, materials or equipment storage, or access shall be permitted outside the Site Location footprint without permission from Metro. All parking and equipment storage used by the contractor related to the Project shall be confined to the Site Location footprint and established paved areas. Undisturbed areas and special-status vegetation communities outside and adjacent to the Site Location footprint shall not be used for parking or equipment storage. Project-related vehicle traffic shall be restricted to the Site Location footprint and established roads and construction access points. • The contractor shall be required to conduct vehicle refueling and maintenance in upland areas where fuel cannot enter waters of the U.S. or WOS waters of the State and areas that do not have suitable habitat to support federally and/or state-listed species. Equipment and containers shall be inspected daily for leaks. Should a leak occur, contaminated soils and surfaces shall be cleaned up and disposed of in accordance with applicable local, State, and federal requirements.				
Mitigation Measure BIO-MM-2: Avoid Impacts on Migratory and Nesting Birds (All Site Locations and takedown locations of existing static displays). If construction activities occur between January 15 and September 15, a preconstruction nesting bird survey (within seven days prior to construction activities) shall be conducted by a qualified biologist to determine if active nests are present within the area proposed for disturbance in order to avoid the nesting activities of breeding birds by establishing a buffer until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW. The results of the surveys shall be submitted to Metro (and made available to the wildlife agencies [USFWS/	Retain a qualified biologist.	Construction Contractor/Qualified Biologist	Metro	Preconstruction
	Limit construction to outside the bird nesting season. Should vegetation be removed during these times, nesting bird surveys and species protection shall occur.	Construction Contractor/Qualified Biologist	Metro	Preconstruction

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
CDFW], upon request) prior to initiation of any construction activities.				
Mitigation Measure BIO-MM-3: Avoid impacts on Least Bell's Vireo, if present (Applicable to Site Locations FF-29 and FF-30). Suitable habitat for Least Bell's Vireo shall be removed outside of the nesting season (March 15 through September 30), between October 1 and March 14. Should habitat for Least Bell's Vireo require removal between March 15 and September 30, or construction activities are initiated during this time, preconstruction surveys consisting of three separate surveys no more than seven days prior to vegetation removal shall be conducted by a qualified biologist. Should Least Bell's Vireo be detected within 500 feet of the Site Location, construction activities shall be halted unless authorization has been obtained from USFWS.	Retain a qualified biologist.	Construction Contractor	Metro	Preconstruction
	Limit construction to outside the bird nesting season. Should vegetation be removed during these times, nesting bird surveys and species protection shall occur.	Construction Contractor/Qualified Biologist	Metro	Preconstruction
Mitigation Measure BIO-MM-4: Avoid Potential Impacts on Special-Status Bats (All Site Locations and take down locations of static displays). A qualified bat biologist shall conduct a preconstruction survey for potential bat habitat within the take down area of the static display or Site Location footprint prior to vegetation clearing, and/or ground disturbance for take down locations and all Site Locations. If suitable habitat is not found, then no further action is required. If suitable habitat is determined to be present: • A qualified bat biologist shall survey potentially suitable structures and vegetation during bat maternity season (May 1st through October 1st), prior to construction, to assess the potential for the structures' and vegetation's use for bat roosting and bat maternity roosting, as maternity roosts are generally formed in spring. The qualified bat biologist shall also perform preconstruction surveys or temporary exclusion within 2 weeks prior to construction during the maternity season, as bat roosts can change seasonally. These surveys will include a combination of structure inspections, exit counts, and acoustic surveys. • If a roost is detected, a bat management plan shall be prepared if it is determined that Project construction would result in direct impacts on roosting bats. The bat management plan shall be submitted to CDFW for review and approval prior to implementation and include appropriate avoidance and minimization efforts such as: • Temporary Exclusion. If recommended by the qualified bat biologist, to avoid indirect disturbance of bats while roosting in areas that would be adjacent to construction activities, any portion of a structure deemed by a qualified bat biologist to have potential bat roosting habitat and may be affected by the Project shall have temporary eviction and exclusion devices installed under the supervision of a qualified and permitted bat biologist prior to the initiation of construction activities. Eviction and subsequent exclusion shall be conducted during the fall (September or October) to avoid trapping flightless young bats inside during the summer months or hibernating/overwintering individuals during the winter. Such exclusion efforts are dependent on weather conditions, take a minimum of two weeks to implement, and must be continued to keep the structures free of bats until the completion of construction. All eviction and/or exclusion techniques shall be coordinated between the qualified bat biologist	Retain a qualified bat biologist.	Construction Contractor	Metro	Preconstruction; Construction
	Survey potentially suitable structures and vegetation during bat maternity season.	Construction Contractor/Qualified Bat Biologist	Metro	Preconstruction; Construction
	If a roost is detected prepare a bat management plan.	Construction Contractor/Qualified Bat Biologist	Metro	Preconstruction; Construction

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
and the appropriate resource agencies (e.g., CDFW) if the structure is occupied by bats. If deemed appropriate, the biologist may recommend installation of temporary bat panels during construction. If a roost is detected but would only be subject to indirect impacts: • Daytime Work Hours. All work conducted under the occupied roost shall take place during the day. If this is not feasible, lighting and noise will be directed away from night roosting and foraging areas.				
Cultural Resources				
Mitigation Measure CUL-MM-1: Prior to the start of ground disturbance activities during Project construction, including demolition, digging, trenching, drilling, or a similar activity (Ground Disturbance Activities), a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Site Locations, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor(s) shall provide Worker Environmental Awareness Program (WEAP) training to construction workers involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction workers shall be informed about proper procedures to follow should a worker discover a cultural resource during Ground Disturbance Activities. In addition, construction workers shall be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Site Locations, for Metro inspection, documentation establishing that the training was completed for all construction workers involved in Ground Disturbance Activities. The archaeological monitor(s) shall observe all Ground Disturbance Activities on the Site Locations that involve native soils. If Ground Disturbance Activities are occurring simultaneously at multiple Site Locations, the principal archaeologist shall determine if additional monitors are required for other Site Locations where such simultaneous Ground Disturbance Activities are occurring. The on-site archaeological monitoring shall end when the archaeological monitor determines that monitoring is no longer necessary.	Retain a Qualified Principal Archeologist.	Construction Contractor	Metro	Preconstruction; Construction
	Prepare a Cultural Resource Monitoring and Treatment Plan.	Construction Contractor/Qualified Archeologist	Metro	Preconstruction; Construction
	Conduct a Worker Environmental Awareness Program for all Project personnel and contractors who will be on the Site Locations.	Construction Contractor/Qualified Archeologist	Metro	Preconstruction; Construction
	Archaeological monitor(s) shall observe all Ground Disturbance Activities on the Site Locations that involve native soils.	Construction Contractor/Qualified Archeologist	Metro	Preconstruction; Construction
Geology and Soils				
Project Design Feature GEO-PDF-1: All development activities conducted on the Site Locations will incorporate the professional recommendations contained in the Geology and Soils Evaluation and associated recommendations set forth in a site location-specific, design-level geologic and geotechnical investigation(s)	Incorporate the professional recommendations contained in the Geology and Soils Evaluation and associated recommendations set forth	Construction Contractor	Metro and/or City of Los Angeles	Preconstruction

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
approved by the Metro Capital Engineering Group and/or the Los Angeles Department of Building and Safety (LADBS), provided such recommendations meet and/or surpass relevant state and City laws, ordinances, Code requirements, and MRDC requirements, California Geological Survey's Special Publication 117A and the City's Building Code, as applicable. Such professional recommendations include site-specific subsurface exploration and laboratory testing, foundation systems that are specific to the geologic materials encountered at each individual site, and prohibition of the use of fill materials to support foundation systems.	in a site location-specific, design-level geologic and geotechnical investigation(s).			
Mitigation Measure GEO-MM-1: The services of a Project paleontologist who meets the Society of Vertebrate Paleontology standards (including a graduate degree in paleontology or geology and/or a publication record in peer reviewed journals, with demonstrated competence in the paleontology of California or related topical or geographic areas, and at least two full years of experience as assistant to a Project paleontologist), shall be retained prior to ground disturbance activities associated with Project construction in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan. The Paleontological Resource Mitigation and Treatment Plan shall specify the levels and types of mitigation efforts based on the types and depths of ground disturbance activities and the geologic and paleontological sensitivity of the Site Locations. The Paleontological Resource Mitigation and Treatment Plan shall also include a description of the professional qualifications required of key staff, communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens.	Retain a Qualified Paleontologist.	Construction Contractor	Metro	Preconstruction
	Prepare a site-specific Paleontological Resource Mitigation and Treatment Plan.	Qualified Paleontologist	Metro	Preconstruction
Hazards and Hazardous Materials				
Mitigation Measure HAZ-MM-1 (All Site Locations): Soil Management Plan (SMP)—The Project Applicant shall implement an SMP, which shall be submitted to the Metro Capital Engineering Group and/or City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The Site Locations shall be subject to the general protocols described in the SMP regarding prudent precautions and general observations and evaluations of soil conditions to be implemented throughout grading, excavation, or other soil disturbance activities on the Site Locations. The protocols in the SMP shall include, but not be limited to, the following: • Special precautions shall be taken to manage soils that will be disturbed during Project earthwork activities in areas containing Chemicals of Concern (COCs) above screening levels (SLs). • The following requirements and precautionary actions shall be implemented when disturbing soil at the Site Locations: no soil disturbance or excavation activities shall occur without a Project-specific Health and Safety Plan (HASP). Any soil that is disturbed, excavated, or trenched due to on-site construction activities shall be handled in accordance with applicable local, state, and federal regulations. Prior to the re-use of the excavated soil or the disposal of any soil from the Site Locations, the requirements and guidelines in the SMP	Review and approve soil management plan.	Metro Environmental Services Department and/or the Los Angeles Department of Building and Safety	Metro and/or City of Los Angeles	Preconstruction; Construction
	Implement soil management plan.	Construction Contractor	Metro and/or City of Los Angeles	Preconstruction; Construction

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
shall be implemented. The General Contractor shall conduct, or have its designated subcontractor conduct, visual screening of soil during activities that include soil disturbance. If the General Contractor or subcontractor(s) encounter any soil that is stained or odorous (Suspect Soil), the General Contractor and subcontractor(s) shall immediately stop work and take measures to not further disturb the soils (e.g., cover suspect soil with plastic sheeting) and inform the Metro's representative and the environmental monitor. The environmental monitor, an experienced professional trained in the practice of the evaluation and screening of soil for potential impacts working under the direction of a licensed Geologist or Engineer, shall be identified by Metro prior to the beginning of work. • Prior to excavation activities, the General Contractor or designated subcontractor shall establish specific areas for stockpiling Suspect Soil, should it be encountered, to control contact by workers and dispersal into the environment, per the provisions provided in the SMP. • The General Contractor shall ensure that on-site construction personnel comply with all applicable federal, state, and local regulations, as well as the State of California Construction Safety Orders (Title 8). Additionally, if Suspect Soil is expected to be encountered, personnel working in that area shall comply with California Occupational Safety and Health Administration regulations specified in CCR Title 8, Section 5192. The General Contractor shall prepare a Project-specific HASP. It is the responsibility of the General Contractor to review available information regarding Site Location conditions, including the SMP, and potential health and safety concerns in the planned area of work. The HASP should specify COC action levels for construction workers and appropriate levels of personal protective equipment (PPE), as well as monitoring criteria for increasing the level of PPE. The General Contractor and each subcontractor shall require its employees who may directly contact Suspect Soil to perform all activities in accordance with the General Contractor and subcontractor's HASP. If Suspect Soil is encountered, to minimize the exposure of other workers to potential contaminants on the Site Location, the General Contractor or designated subcontractor may erect temporary fencing around excavation areas with appropriate signage as necessary to restrict access and to warn unauthorized on-site personnel not to enter the fenced area. • The General Contractor shall implement the following measures as provided in the SMP to protect human health and the environment during construction activities involving contact with soils at the Site Location: decontamination of construction and transportation equipment; dust control measures; storm water pollution controls and best management practices; and proper procedures for the handling, storage, sampling, transport and disposal of waste and debris. • The excavated soil should be screened using a calibrated hand-held PID to test for VOCs and methane as necessary. • In the event volatile organic compound (VOC)-contaminated soil is encountered during excavation on-site, a South Coast Air Quality Management District (SCAQMD) Rule 1166 permit shall be obtained before resuming excavation. Rule 1166 defines VOC-contaminated soil as a soil which registers a concentration of 50 ppm or greater of VOCs as measured before suppression				

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
materials have been applied and at a distance of no more than three inches from the surface of the excavated soil with an organic vapor analyzer calibrated with hexane. Notifications, monitoring, and reporting related to the SCAQMD Rule 1166 permit shall be the responsibility of the General Contractor. Protection of on-site construction workers shall be accomplished by the development and implementation of the HASP. • Known below-grade structures at the Site Locations (i.e., storm water infrastructure) shall be removed from the ground or cleaned, backfilled, and left in place as appropriate during grading and excavation. If unknown below-grade structures are encountered during Site Location excavation, the General Contractor shall promptly notify the Metro's representative the same day the structure is discovered. Based on an evaluation of the unknown below-grade structure by the appropriate professional (e.g., environmental monitor, geotechnical engineer), Metro shall address the below-grade structure in accordance with applicable laws and regulations. • A geophysical investigation shall be conducted at the Site Locations to clear the construction area of buried utilities.				
Mitigation Measure HAZ-MM-2 (Site Locations FF-1, FF-2, FF-3, FF-4, FF-5, FF-6, FF-13, FF-14, FF-29, FF-30, NFF-1, NFF-2, NFF-3, NFF-8, NFF-12, NFF-13, NFF-18, NFF-19, and NFF-21): Soil/vapor sampling and testing of soil samples shall be obtained during the site location-specific, design-level geologic and geotechnical investigation. Results of the testing would be submitted and approved by the Metro Capital Engineering Group and/or the Los Angeles Department of Building and Safety (LADBS).	Conduct soil/vapor sampling and testing.	Construction Contractor	Metro and/or City of Los Angeles	Preconstruction
	Review and approve soil/vapor sampling and testing results.	Metro Environmental Services Department and/or the Los Angeles Department of Building and Safety	Metro and/or City of Los Angeles	Preconstruction
Mitigation Measure HAZ-MM-3 (Site Locations FF-4, NFF-3, NFF-18, and NFF-21): A geophysical investigation shall be conducted to clear the construction area of buried utilities and to identify buried substructures, specifically oil wells and USTS. Results of the geophysical investigation shall be submitted to and approved by the Metro Capital Engineering Group and/or LADBS.	Conduct a geophysical investigation.	Construction Contractor	Metro and/or City of Los Angeles	Preconstruction
	Review and approve geophysical investigation results.	Metro Environmental Services Department and/or the Los Angeles Department of Building and Safety	Metro and/or City of Los Angeles	Preconstruction
Noise				
Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.	Equip power construction equipment with state-of-the-art noise shielding and muffling devices.	Construction Contractor	Metro and/or City of Los Angeles	Construction
	Maintain noise shielding and muffling device equipment.	Construction Contractor	Metro and/or City of Los Angeles	Construction
Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure. *During TCN Structure NFF-11 Construction* • Between the Project construction area and the residential uses on 67th Street north of the Site Location (receptor location R5). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R5.	Building plans shall include documentation prepared by a noise consultant verifying use of sound barriers.	Construction Contractor	Metro and/or City of Los Angeles	Preconstruction; Construction
	A temporary and impermeable sound barrier shall be erected.	Construction Contractor	Metro and/or City of Los Angeles	Preconstruction; Construction

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
During TCN Structure NFF-12 Construction • Between the Project construction area and the residential uses on Victoria Avenue west of the Site Location (receptor location R6). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R6. *During TCN Structure NFF-14 Construction* • Between the Project construction area and the residential uses on Exposition Boulevard southeast of the Site Location (receptor location R7). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R7. *During TCN Structure NFF-19 Construction* • Between the Project construction area and the residential uses on New Hampshire Avenue west of the Site Location (receptor location R10). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R10. *During TCN Structure NFF-20 Construction* • Between the Project construction area and the residential uses on New Hampshire Avenue northwest of the Site Location (receptor location R12). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R12. *During TCN Structure NFF-21 Construction* • Between the Project construction area and the residential uses on Mateo Street west of the Site Location (receptor location R13). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R13. *During TCN Structure FF-13 Construction* • Between the Project construction area and the residential uses on Casitas Avenue Street west of the Site Location (receptor location R20). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R20. *During TCN Structure FF-26 Construction* • Between the Project construction area and the residential uses on Sepulveda Boulevard northeast of the Site Location (receptor location R25). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R25. *During TCN Structure FF-28 Construction* • Between the Project construction area and the residential uses on Exposition Boulevard south of the Site Location (receptor location R27). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R27. *During TCN Structure FF-33 Construction* • Between the Project construction area and the residential uses on Slauson Avenue north of the Site Location (receptor location R28. The temporary sound barrier shall be designed to provide a minimum 11-dBA noise reduction				

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
at the ground level of receptor location R28.				
Mitigation Measure NOI-MM-2: Construction for TCN Structure NFF-20 shall be completed prior to occupation of the adjacent future residential building (receptor R12B). Alternatively, construction equipment for the installation of the TCN Structure NFF-20 shall be limited to a maximum 75 dBA (L_{eq}) at 50 feet from the equipment.	Complete construction prior to occupation of the adjacent future residential building, or	Construction Contractor	Metro and/or City of Los Angeles	Construction
	Construction equipment shall be limited to a maximum 75 dBA (L_{eq}) at 50 feet from the equipment.	Construction Contractor	Metro and/or City of Los Angeles	Construction
Mitigation Measure NOI-MM-3: A temporary noise barrier shall be provided during the removal of existing static signage where noise sensitive uses are located within 200 feet of and have direct line-of-sight to the existing static signage to be removed. The temporary noise barrier shall be a minimum six feet tall and break the line-of-site between the construction equipment and the affected noise sensitive receptors.	Install a temporary noise barrier during the removal of existing static signage where noise sensitive uses are located within 200 feet of and have direct line-of-sight to the existing static signage to be removed.	Construction Contractor	Metro and/or City of Los Angeles	Construction
Mitigation Measure NOI-MM-4: The use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) shall be limited to a minimum of 80 feet away from the existing residences near proposed TCN Structure FF-33 (receptor 28) and the future residences near proposed TCN Structure NFF-20 (receptor 12B), if these residences are constructed and occupied at the time Project construction activities occurs.	Limit use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) to a minimum of 80 feet away from the existing residences	Construction Contractor	Metro and/or City of Los Angeles	Construction
Tribal Cultural Resources				
Mitigation Measure MM-TCR-1 (Retain a Tribal Consultant and Qualified Archaeologist): Prior to any ground-disturbing activities on the Site Locations associated with the Project Area, a tribal consultant and qualified archaeologist shall be retained to monitor ground-disturbing activities and ensure proper implementation of the Tribal Cultural Resources Monitoring and Mitigation Program (described in Mitigation Measure TCR-2, below). Ground disturbing activities are defined as excavating, digging, trenching, drilling, tunneling, grading, leveling, removing asphalt, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at a Site Location. A tribal consultant is defined as one who is on the Native American Heritage Commission (NAHC) Tribal Contact list. The tribal consultant will provide the services of a representative, known as a tribal monitor. A qualified archaeologist is defined as one who meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) for archaeology. The qualified archaeologist shall submit a letter of retention to Metro no fewer than 30 days before ground-disturbing activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the SOI PQS.	Retain a tribal consultant and qualified archaeologist.	Metro	Metro	Preconstruction; Construction
	A tribal consultant and qualified archaeologist shall monitor ground-disturbing activities and ensure proper implementation of the Tribal Cultural Resources Monitoring and Mitigation Program.	Construction Contractor/Qualified Archaeologist	Metro	Preconstruction; Construction
Mitigation Measure MM-TCR-2 (Develop a Tribal Cultural Resource Mitigation and Monitoring Program): Prior to any ground-disturbing activities within the Project Area, a Tribal Cultural Resource Mitigation and Monitoring Program (TCR MMP) shall be prepared by the qualified archaeologist. The TCR MMP shall incorporate the results of SWCA's *Tribal Cultural Resources Assessment for the Los Angeles County Metropolitan Transportation Authority's Transportation Communication Network Project* report, and reasonable and	Retain a qualified archaeologist.	Construction Contractor	Metro	Preconstruction; Construction
	Prepare Tribal Cultural Resources Monitoring and Mitigation Program.	Qualified Archaeologist	Metro	Preconstruction; Construction
	Implement Tribal Cultural Resources Monitoring and Mitigation Program.	Construction Contractor/Qualified Archaeologist	Metro	Preconstruction; Construction

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
feasible recommendations from tribal parties resulting from consultation. The TCR MMP shall include provisions for avoidance of unanticipated discoveries and procedures for the preservation of unanticipated discoveries where possible. The TCR MMP shall include, but not be limited to, provisions to conduct a worker training program, a monitoring protocol for ground-disturbing activities, discovery and processing protocol for inadvertent discoveries of tribal cultural resources, and identification of a curation facility should artifacts be collected. The TCR MMP shall require monitoring of ground-disturbing activities at all Site Locations and will provide a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving tribal cultural resources are present, and include a protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate at any given Site Location. The duration and timing of the monitoring shall be determined based on the rate of excavation, geoarchaeological assessment, and, if present, the quantity, type, spatial distribution of the materials identified, and input of the tribal consultant or their designated monitor. During monitoring, daily logs shall be kept and reported to Metro on a monthly basis. During ground-disturbing activities, the monitors shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially tribal cultural resources, as determined by the qualified archaeologist in consultation with the tribal monitor. In the event that tribal cultural resources or potential tribal cultural resources are exposed during construction, work in the immediate vicinity of the find shall stop within a minimum of 25 ft or as determined by the qualified archaeologist in consultation with the tribal consultant based on the nature of the find and the potential for additional portions of the resource to remain buried in the unexcavated areas of the project site. The qualified archaeologist in consultation with the tribal consultant will evaluate the significance of the find and implement the protocol described in the TCR MMP before work can resume in the area surrounding the find that is determined to have sensitivity. Construction activities may continue in other areas in coordination with the qualified archaeologist and tribal consultant. Soils that are removed from the work site are considered culturally sensitive and will be subject to inspection on-site by the tribal and archaeological monitors. Provisions for inspection at an off-site location would be determined through consultation with the tribal and archaeological monitors, construction personnel, and Metro. Any tribal cultural resources that are not associated with a burial are subject to collection by the qualified archaeologist. The TCR MMP shall also summarize the requirements for coordination with consulting tribal parties in the event of a tribal cultural resource or potential tribal cultural resource is inadvertently discovered, as well as the applicable regulatory compliance measures or conditions of approval for inadvertent discoveries, including the discovery of human remains, to be carried out in concert with actions described in the TCR MMP and treatment plan prepared in compliance with Mitigation Measure TCR-3. The TCR MMP shall be prepared in compliance with Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The TCR MMP shall be submitted to Metro at least 30 days prior to initiating ground-disturbing activities.				

Table IV-1 (Continued)
Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Monitoring Action	Responsible Party	Enforcement Agency	Monitoring Phase
Mitigation Measure MM-TCR-3 (Treatment of Known Tribal Cultural Resources): A treatment plan will be developed for any historical archaeological sites that may be adversely affected/significantly impacted by the Project, including but not limited to CA-LAN-1575/H. The treatment plan will be developed based on the known constituents to guide the post-discovery process and initial treatment requirements upon discovery. The treatment plan will outline data recovery procedures to be followed and shall require controlled archaeological excavation within the first eight feet (ft) at all Site Locations proposed to be located within known tribal cultural resources, specifically an excavation unit measuring 3.28 ft by 3.28 ft across extending to a depth of at least 4.92 ft below the unpaved surface, followed by the use of a 4 inch hollow stem hand-auger to a total depth of at least 9.84 ft below the unpaved surface. Subsequent mechanical drilling will be conducted in approximately 1.64-ft increments to a depth of approximately 20 ft below the surface. Sediments from each of the 1.64-ft mechanical excavation levels will be inspected for the presence of Native American objects or evidence of a tribal cultural resource, and relevant environmental information obtained from the sediments will be recorded. The treatment plan will include provisions to allow for standard mechanical excavation to resume at levels above these depths in the event that sufficient evidence is identified to demonstrate that the sediments are more than 20,000 years old. The treatment plan may be modified and updated depending on the nature of the discovery and consultation with the State Historic Preservation Office (SHPO) and consulting parties. The treatment plan would be developed so that treatment of historical resources meets the Secretary of the Interior's *Standards and Guidelines* (1983) for archaeological documentation, the California Office of Historic Preservation (OHP)'s *Archaeological Resources Management Report, Recommended Contents and Formats* (1989), the Advisory Council on Historic Preservation's publication *Treatment of Archaeological Properties: A Handbook*, and the Department of the Interior's Guidelines for Federal Agency Responsibility under Section 110 of the National Historic Preservation Act, and the Society for California Archaeology's *Guidelines for Determining the Significance of and Impacts to Cultural Resources and Fieldwork* and *Reporting Guidelines for Archaeological, Historic, and Tribal Cultural Resources*.	Develop a treatment plan for any historical archaeological sites that may be adversely affected/significantly impacted by the Project.	Qualified Archaeologist	Metro	Preconstruction; Construction
	Implement a treatment plan for any historical archaeological sites that may be adversely affected/significantly impacted by the Project.	Construction Contractor/ Qualified Archaeologist	Metro	Preconstruction; Construction