



Sixth Street Park, Arts, River & Connectivity (PARC) Project

SCH #2017041045

MITIGATION MONITORING PROGRAM



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PREPARED FOR:

City of Los Angeles, Department of Public Works
Bureau of Engineering, Environmental Management Group
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TRANSMITTAL NO. 4

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Mitigation Monitoring Program

Introduction

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

The City of Los Angeles (City), the Lead Agency on behalf of the Los Angeles Department of Public Works (LADPW), Bureau of Engineering (LABOE), is the Lead Agency for the Sixth Street PARC Project (proposed Project), and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

Purpose

The purpose of the MMP is to do the following:

- Coordinate all mitigation monitoring activities
- Manage the preparation, approval, and filing of monitoring or permit compliance records
- Maintain records concerning the status of all approved mitigation measures (MM) and best management practices (BMP)
- Provide quality control assurance of field monitoring personnel
- Coordinate with other agencies regarding compliance with mitigation or permit requirements
- Review and recommend acceptance and certification of implementation documentation
- Act as a contact for interested parties or surrounding property owners who wish to register concerns regarding environmental issues; verifying any such circumstances; and developing any necessary corrective actions.

Organization

As shown in the following pages, each identified mitigation measure for the proposed Project is listed and categorized by environmental issue area, with accompanying discussion of:

- Time Frame for Implementation: When the measure will be implemented.

- **Monitoring Period:** Indicates when monitoring for compliance with the measure will occur.
- **Monitoring Agency:** The agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Verification of Compliance:** The date that monitoring is complete to ensure compliance with the measure.

Monitoring and Reporting Procedures

This MMP shall be enforced throughout all phases of the proposed Project. LABOE shall be responsible for implementing each project design feature and mitigation measure and shall be obligated to provide verification, as identified below, to the appropriate monitoring and enforcement agencies that each project design feature and mitigation measure has been implemented. LABOE shall maintain records demonstrating compliance with each project design feature and mitigation measure listed below.

All applicable construction-related mitigation measures and best management practices will be included in any bid specification released for construction of the proposed Project. Prior to the release of the bid specifications, construction plans and specifications will be provided to LABOE's Environmental Management Group (EMG) for review and approval regarding environmental mitigation. Unless otherwise specified herein, LABOE will be responsible for taking all actions necessary to implement the mitigation measures according to the provided specifications and demonstrating that each action has been successfully completed. LABOE, at its discretion, may delegate implementation responsibility or portions thereof to a licensed contractor. This MMP for the proposed Project will be in place through design, construction, and operation. LABOE will be responsible for administering the MMP and ensuring that all parties comply with its provisions. LABOE may delegate monitoring responsibilities to staff, consultants, or contractors.

The construction contractor shall submit an Environmental Compliance Plan for LABOE Construction Management and LABOE EMG approval prior to the beginning of ground-disturbing construction activities. The Environmental Compliance Plan will document how the contractor intends to comply with all environmental measures applicable to the contract, including application of BMPs. LABOE Construction Management will also ensure that monitoring is documented in an Environmental Compliance Report and that deficiencies are promptly corrected. A designated environmental monitor with LABOE Construction Management will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to rectify problems. LABOE will monitor compliance with operational mitigation measures.

During the construction phase and prior to going through plan check review, LABOE shall retain an independent Construction Monitor (either via the City or through a third-party consultant), who shall be responsible for monitoring implementation of mitigation measures and best management practices during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the City's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to

LABOE. The documentation must be signed by LABOE and the Construction Monitor and be included as part of the City's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with mitigation measures and project design features within two businesses days if the non-compliance is not corrected within a reasonable time or if the non-compliance is repeated.

Changes to Mitigation Measures

Changes to Mitigation Measures Under CEQA, mitigation measures may be modified or deleted if the relevant decision-maker approves such action, gives a legitimate reason for making the change, and supports those reasons with substantial evidence, including an appropriate subsequent CEQA document. Any substantive change to the MMP shall be documented in writing. Modifications to the mitigation measures/BMPs may be made by the LABOE subject to one of the following findings and documented by evidence included in the record:

1. The measure/BMP included in the EIR and the MMP is no longer required because the significant environmental impact identified in the EIR has been found not to exist, or to occur at a level which makes the impact less than significant as a result of changes in the Project, changes in conditions of the environment, or other factors.

OR

2. The modified or substitute mitigation measure/BMP to be included in the MMRP provides a level of environmental protection equal to or greater than that afforded by the mitigation measure included in the EIR and the MMP.

AND

3. The modified or substitute mitigation measure/BMP does not have significant adverse effect on the environment in addition to or greater than those which were considered by LABOE in its decisions regarding the EIR and the Proposed Project.

AND

4. The modified or substitute mitigation measure/BMP is feasible, and LABOE, through measures included in the MMP or other established procedures, can assure its implementation.

Findings and related documentation supporting the findings involving modifications to mitigation measures shall be maintained in the Project file with the MMP and shall be made available to the public upon request.

Mitigation Monitoring Program

Mitigation Measures

Air Quality

MM-AQ-1: Newer/Tier 4 Engines in Haul Trucks and Construction Equipment

- Measures:
 - Include in all construction contracts the requirement to use 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).
 - Include in all construction contracts the requirement that all off-road diesel-fueled construction equipment greater than 50 horsepower shall meet Tier 4 off-road emission standards. In addition, if not already supplied with a factory-equipped diesel particulate filter, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. To the extent locally available, construction equipment shall incorporate emissions savings technology such as hybrid drives. In the event that any equipment required under this mitigation measure is not available, provide documentation as information becomes available. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided.
 - Maintain construction equipment by conducting regular tune-ups according to the manufacturers' recommendations.
 - To the extent possible, the import and export of onsite materials shall be scheduled to minimize empty return trips.
- Time Frame for Implementation:

Design Phase:

Timing/Schedule: Prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by the contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance

Construction Phase:

Timing/Schedule: Throughout Project construction.

Implementation: LABOE Project Engineer and Construction contractor shall implement mitigation measure and review engine and equipment certified tier specification and best available control

technology documentation. Similarly, contractor may provide the ARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment. Considered complete after end of Project construction.

Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-AQ-2: Construction Equipment Requirements

- Measures:
 - All on- and off-road diesel-fueled equipment shall not idle for more than 5 minutes when not in use. The idling of diesel-fueled equipment and haul trucks within 1,000-feet of nearby residential land uses shall be prohibited. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute-idling limit.
 - Staging and queuing areas shall be located at the furthest distance possible from nearby residential land uses.
 - Use alternatively fueled (e.g., compressed natural gas, liquefied natural gas, propane), gasoline-fueled, or electrified construction equipment in place of diesel-fueled equipment to the extent locally available.

Design Phase:

Timing/Schedule: Prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance

Construction Phase:

Timing/Schedule: Throughout Project construction.

Implementation: LABOE Project Engineer and Construction contractor

Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-AQ-3: Fugitive Dust Controls

- Measures:
 - All active portions of the construction site shall be watered twice daily to prevent excessive amounts of dust.

- Non-toxic soil stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain) according to manufacturers' specifications.
- All excavating and grading operations shall be suspended when wind gusts (as instantaneous gust) exceed 25 miles per hour.
- On-site off-road equipment and on-road vehicles used on-site shall be limited to 15 miles per hour.
- All on-site roads shall be paved as soon as feasible, watered twice daily, or chemically stabilized.
- Visible dust beyond the property line which emanates from the project shall be prevented to the maximum extent feasible.
- All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site.
- Track-out devices shall be used at all construction site access points.
- All delivery truck tires shall be watered down and/or scraped down prior to departing the job site.
- Streets shall be swept at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway.
- Replace ground cover in disturbed areas as quickly as possible.
- All trucks that are to haul excavated or graded material on-site shall comply with State Vehicle Code Section 23114 (Spilling Loads on Highways), with special attention to Sections 23114(b)(F), (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.
- Conduct continuous, direct-reading, near real-time ambient monitoring of Particulate Matter (PM)₁₀. Install appropriate signage and notify the SCAQMD in accordance with Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants, prior to conducting any earth-moving activities on any site meeting the applicability of the rule.

Design Phase:

Timing/Schedule: Prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor

- **Enforcement:** LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

Hazards and Hazardous Materials

MM-HAZ-1: Remediation Category 1A

- **Measures:** The City shall be required to implement the following measures in areas where Resource Conservation and Recovery Act (RCRA) Level Heavy Metals, polychlorinated biphenyls (PCB), or total petroleum hydrocarbon diesel range organics (TPH DRO) will be excavated and disposed of at Class 1 Hazardous Waste Landfills:
 - Soils will be excavated as needed up to a maximum depth of 4.5-feet below ground surface (bgs), consistent with the limits designated on Figures 3.8-3a and 3.8-3b, Areas of Concern with Contamination.
 - The transport and disposal of RCRA hazardous waste will be accompanied with a Hazardous Waste Manifest (i.e., documentation accompanying the transport, treatment, storage and disposal of hazardous waste) completed by a licensed transporter. A site-specific California Environmental Protection Agency (CalEPA) Hazardous Waste Generator Identification Number will be obtained for each RCRA hazardous waste. Additional sampling and testing will likely be required by the facility accepting the soil for disposal.
 - For excavations deeper than 4-feet, shoring or other approved means will be required to maintain stability of the excavation walls.
 - During excavation activities, dust and runoff controls will be implemented to prevent windborne or surface waterborne migration of the soil from the Project Site. The soils will be directly loaded into the transport trucks, which will require tarps to prevent spillage or windblown loss of soil during transport. These controls will be verified and monitored by an independent third party.
 - A site-specific Health and Safety Plan (HASP) will be prepared and implemented during all proposed construction activities, including full time perimeter sampling and testing of particulates and dust from the Project Site.
 - All onsite workers and supervisors will complete a 40-hour Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) training course and be equipped with the appropriate personal protective equipment.
 - Excavated areas will be backfilled with certified clean soil.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-HAZ-2: Remediation Category 2A and 2B

Remediation Category 2A

- Measures: The City shall be required to implement the following measures in areas where soils contaminated with Heavy Metals and/or TPH DRO that are classified as non-RCRA hazardous waste will be excavated. These contaminated soils shall be disposed at Class 2 Landfills:
 - Soils will be excavated as needed up to a maximum depth of 6-feet bgs, consistent with the limits designated on Figures 3.8-3a and 3.8-3b, Areas of Concern with Contamination.
 - The transport and disposal of non-RCRA hazardous waste will be accompanied with a Hazardous Waste Manifest completed by a licensed transporter. A CalEPA Non-RCRA Hazardous Waste Generator Identification Number will be obtained. Additional sampling and testing will likely be required by the facility accepting the soil for disposal.
 - For excavations deeper than 4-feet, shoring or other approved means shall be required to maintain stability of the excavation walls.
 - During excavation activities, dust and runoff controls will be implemented to prevent windborne or surface waterborne migration of the soil from the Project Site. The soils will be directly loaded into the transport trucks, which will require tarps to prevent spillage or windblown loss of soil during transport. These controls will be verified and monitored by an independent third party.
 - A site-specific Health and Safety Plan (HASP) will be prepared and implemented during all proposed construction activities, including full time perimeter sampling and testing of particulates and dust from the Project Site.
 - All onsite workers and supervisors will complete a 40-hour OSHA HAZWOPER training course and be equipped with the appropriate personal protective equipment.
 - Excavated areas will be backfilled with certified clean soil.

Remediation Category 2B

- Measures: In addition to the measures above, the following measures shall be implemented in areas where volatile organic compounds (VOC) were observed in soil gases:
 - Emission controls will be used to clear the area of emitting VOCs (i.e., spraying water or applying foam agents to all exposed soil surfaces and/or using large, spark-free fans). Full-time monitoring will be required to verify that the emission controls are effective in preventing the VOCs from impacting workers or the public. Monitoring will comply with SCAQMD Rule 1166.
 - A detailed HASP will be prepared and implemented during the excavation and transport of contaminated soils.
 - The excavation, transport, and disposal of contaminated soils will require permitting and approval by the Certified Unified Program Agency (CUPA), CalEPA/Department of Toxic Substances Control (DTSC), and SCAQMD. A detailed Work Plan/Remedial Action Plan will be prepared and submitted to these agencies for review and approval. Under Rule 1166, a Mitigation Management Plan for potential VOC emissions during excavation will be submitted to SCAQMD and subject to SCAQMD approval. A site-specific CalEPA Hazardous Waste Generator Identification Number will be obtained and manifests completed by the licensed transporter.
 - A soil vapor extraction (SVE) system will be designed and installed to remove and treat VOCs in the soil gases. If Health Risk Assessments indicate the need, a vertical barrier/line will be installed around the perimeter of the area to prevent soil gases with VOCs from migrating back into the area. Gases migrating from below the clean backfill or deeper depths will be extracted through the SVE slotted wells and treated by the SVE treatment system. Treatment for VOCs typically involves carbon filtration unless hydrogen sulfide is detected in the gas stream. Operating and maintenance procedures for the SVE system and permit applications will be prepared and approved by the oversight agency and SCAQMD.
 - If the City determines it is necessary, a “Pilot Study” will be designed and implemented to evaluate the sustainable flow rate and concentration of VOCs in the soil gas stream and to determine the size of the final SVE system components.
 - Design of the SVE system, preparation of a Design Report and Work Plan/Remedial Action Plan (including HASP) will be submitted to and subject to approval by the CUPA and Los Angeles County Fire Department (LACoFD) Site Mitigation Unit.
 - The SVE will be implemented and monitored. This may require several months to over a year.
 - The City shall provide documentation to the CUPA, LACoFD Site Mitigation Unit, and SCAQMD when the SVE has reached the specified clean-up goals.
 - Excavated areas will be backfilled with certified clean soil.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-HAZ-3: Remediation Category 3

Option 1

- Measures: This alternative will involve the same measures as described under Category 2b above. Contaminated soils will be removed to a depth of up to 15-feet or more and shoring of the excavation walls will be necessary. A liner will be installed on the bottom of the excavation area to prevent contaminated soil gas from re-entering the backfill soils. Gas migration from the side walls will be mitigated by either installation of a vertical liner placed on the side walls of the excavation or SVE wells installed vertically outside the limits of the excavation after backfilling is done. The backfill soil will be certified clean fill and placement will need to meet the geotechnical specifications of the Project design. During the process, the site will require strict emissions controls and monitoring.

Option 2

- Measures: This alternative, the SVE treatment method, utilizes extraction and monitoring wells (In Situ Method) or excavation and encapsulation of impacted soils in above ground piles with horizontal slotted piping (On Site Method), a vacuum pump or pumps, and carbon filtration units to extract and remove VOCs from the soil gas. The process requires several steps as follows:
 - Design and implementation of a “Pilot Study” to evaluate the sustainable flow rate and concentration of VOCs in the soil gas stream and to size the final SVE system components.
 - Design of the SVE system, preparation of a Design Report and Work Plan/Remedial Action Plan (including HASP) for submittal to and approval by the CUPA and CalEPA/DTSC.
 - Solicitation of bids for construction and implementation of the remediation.
 - Implementation and monitoring of the SVE. This may require several months to over a year.
 - Reporting to the agencies with documentation that the SVE has reached the specified clean up goals.

Option 3

- Measures: This alternative will mitigate the impact of the VOCs and/or methane and hydrogen sulfide by precluding soil gases migration from the subsurface soil and intrusion into structures or other facilities and surface emissions. Depending on the type of soil gases and pressure in the soil gas, the systems can include several of the following components:
 - Shallow excavation (3- to 4-feet bgs) to allow installation of the mitigation components (some of the soil will be used to backfill trenches)
 - Gravel layers and slotted piping for gas collection
 - Liner installation above the slotted piping and extending side wide
 - Vacuum pumps for gas extraction or air injection blowers
 - Filtration systems to remove VOCs and/or hydrogen sulfide from the gas stream
 - Geomembrane barriers placed beneath concrete slabs and/or foundations or fill areas
 - Installation of automated and/or manual monitoring systems

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-HAZ-4: Remediation Category 4

- Measures: The City shall be required to implement the following measure in areas within Caltrans right-of-way (ROW) where soil contains aerially deposited lead (ADL):
 - In accordance with the Caltrans/DTSC ADL Agreement, soils above a depth of approximately 2.9-feet bgs will require 1-foot of clean soil cover to remain on site per the Caltrans/DTSC ADL Agreement.
- Time Frame for Implementation: Prior to construction

- Monitoring Period: Prior to construction
- Monitoring Agency: LADPW, Contracts Administration Bureau, Construction Inspector

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-HAZ-5: Soil Gas Sampling

- Measures: Additional soil gas sampling and testing is recommended for completion in PARC Areas 1A, 5, 6, 7, and 8. The additional sampling could potentially eliminate or reduce the need for soil gas remediation.

Ambient air and soil gas samples shall be tested for VOCs. If soil gas samples in PARC Area 6 yield ILCR values below the de minimis risk target or within the risk management range, no further mitigation and/or remedial actions will be required. If ILCR values are above the de minimis risk target, additional remedial actions will be taken to lower values to within the risk management range, such as applying SVE to a maximum depth of 15- to 20-feet bgs.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor

- **Enforcement:** LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-HAZ-6: Methane Mitigation and Testing

- **Measures:** Methane mitigation applies to PARC Area 1A, which is located within the Methane Zone, and portions of PARC Area 7, where soil gases were detected and impervious surfaces are to be constructed adjacent to existing buildings. Any buildings (except naturally vented) to be constructed in Area 1A shall have methane mitigation systems meeting Level II requirements involving membrane and passive venter per Table 71 unless additional testing indicates no subsurface gas pressure and lower methane concentrations. In addition, paved areas that are over 5,000 square feet in area and within 15-feet of the exterior wall of a commercial, industrial, institutional building, shall be vented in accordance with the Methane Mitigation Standards, design Level II, unless additional testing indicates no subsurface gas pressure and lower methane concentrations.

Additional testing for methane concentrations and subsurface pressure shall be completed in accordance with the Division 71 Methane Seepage Regulations testing requirements should any buildings or paved areas over 5,000 square feet be proposed in PARC Area 1A and in PARC Area 7 where methane was detected.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- **Timing/Schedule:** Throughout Project construction.
- **Implementation:** LABOE Project Engineer and Construction contractor
- **Enforcement:** LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

Hydrology and Water Quality

MM-HYDRO-1: Public Safety Plan

- Measures: The City, in coordination with United States Army Corps. of Engineers, shall publish a Public Safety Plan in order to reduce the potential for safety impacts related to flooding. The Public Safety Plan shall include an evacuation plan and protocols for protecting pedestrians and potential homeless populations (e.g., vehicular deterrents such as bollards and safety warning devices) in the LA River Access Tunnel during flood conditions.
- Time Frame for Implementation: Design, Construction, and Operation
- Monitoring Period: Design, Construction and Operation
- Monitoring Agency: LADPW, Department of Recreation and Parks

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall lead preparation of the Public Safety Plan and coordinate with Recreation and Parks, other relevant City departments and the United States Army Corp. The LABOE Project Engineer shall include any physical deterrents or safety warning devices in the contract specs and plans. The Contractor bid documents and Environmental Compliance Plan prepared by contractor shall reflect these items.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Must be completed prior to end of construction.
- Implementation: LABOE Project Engineer and required stakeholders (publish Public Safety Plan prior to project operations) and Construction contractor (physical elements)
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector for physical plan elements.

Operations Phase:

- Timing/Schedule: ongoing
- Implementation: City of Los Angeles, Department of Recreation and Parks, Los Angeles Police Department, US Army Corp, and other relevant stakeholders

Noise and Vibration

MM-NOISE-1: Construction-Noise Management Plan

- Measures: A construction-noise management plan (CNMP) shall be prepared for the Project. The CNMP shall, at a minimum, include the following measures:

- Construction activities shall be restricted outside the hours of 7:00 a.m. to 9:00 p.m. Monday through Friday, and between the hours of 8:00 a.m. to 6:00 p.m. on Saturdays. While the intention is not to conduct work on Sundays, occasional Sunday work may be required to ensure the Project schedule is met. If it is determined that Sunday work is necessary, the proper permits will need to be obtained through the Police Commission. Construction activities shall be prohibited on federal holidays.
- Construction equipment shall be properly maintained and equipped with mufflers.
- Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that requires idling to maintain performance.
- A public liaison shall be appointed for project construction and shall be responsible for addressing public concerns about construction activities, including excessive noise. As needed, the liaison shall determine the cause of the concern (e.g., starting too early, bad muffler) and implement measures to address the concern. The liaison will work directly with the construction contractor to ensure implementation of the noise control plan.
- The liaison will work directly with the construction contractor to ensure implementation of the noise control plan.
- The public shall be notified in advance of the location and dates of construction hours and activities.
- Where necessary, temporary sound barriers shall be installed.
- Signage and notification on where to report construction-generated noise shall be posted on-site and around the construction area, as well as on the Bureau of Engineering website.
- Staging and queuing areas shall be located at the furthest distance possible from nearby residential land uses, as well as any other noise-sensitive land uses identified in the Project Area at the time of construction (e.g., transient lodging, schools, libraries, churches, hospitals, and nursing homes).
- Limit noise/vibration intensive activities occurring within 10-feet of existing structures and occupied land uses. Where possible and to the extent locally available, select low-noise/vibration generating equipment when activities occur within 10-feet of adjacent existing structures.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.

- Implementation: LABOE Project Engineer and Construction contractor
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

Transportation and Traffic

MM-TRANS-1: Mobility Hub

- Measures: The City shall reserve space for a mobility hub at the Project Site, including additional amenities for bicyclists, drivers, and transit users, to encourage event attendees to use alternative modes of transportation.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-TRANS-2: Bicycle Facilities

- Measures: The City shall reserve space for a Bike Share hub at the Project Site to allow Bike Share participants to dock bicycles and scooters.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-TRANS-3: Rideshare Zones

- Measures: The City shall create permanent rideshare pick-up and drop-off zones for the East Park and West Park. Rideshare pick-up/drop-off zones could be located on South Santa Fe Street adjacent to the proposed West Park and South Mission Road adjacent to the proposed East Park. The pick-up/drop-off zones shall be clearly marked, and wayfinding signage shall be installed throughout the Project Site.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor

Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

MM-TRANS-4: Public Transportation

- Measures: The City shall reserve space at the Project Site to accommodate a future Sixth Street Metro Station in the Arts Plaza.

Design Phase:

Timing/Schedule: During Project design, prior to Project construction.

Implementation: LABOE Project Engineer shall include requirement in contract specs and plans. Mitigation measures shall be included in contractor bid documents and Environmental Compliance Plan prepared by contractor.

Enforcement: LABOE Project Manager and LABOE EMG will review specs and plans for compliance.

Construction Phase:

- Timing/Schedule: Throughout Project construction.
- Implementation: LABOE Project Engineer and Construction contractor
- Enforcement: LABOE Construction Manager and LADPW, Bureau of Contracts Administration, Construction Inspector. BOE EMG will review Environmental Compliance Plan prepared by Contractor, the Environmental Compliance Report and the Project Acceptance and Closeout Report.

Best Management Practices

As standard best practices, the BOE Project Engineer shall incorporate the following requirements in the contract specs and plans and ensure the contractor includes the best management practices in the Environmental Compliance Plan prepared by the contractor. The BOE Construction Manager and Contracts Administration Bureau Construction Inspector will ensure the BMPs are implemented during construction. BMPs related to operations will be implemented by the Department of Recreation and Parks and/or other appropriate organizations.

Aesthetics

BMP-AES-1: Construction Lighting

- Measures: If nighttime lighting at the construction site is required, lighting shall be directed downward, on-site, and away from surrounding land uses.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-AES-2: Construction Staging and Construction Staging Area

- Measures: Construction staging shall be coordinated with the construction and maintenance of the Viaduct Replacement Project as needed; therefore, additional use or acquisition of public space for equipment and vehicles will not be required. The construction area shall be fenced to obscure views of construction activities, materials, and staged equipment.
- Implementation Phase: Prior to Construction and Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-AES-3: Operational Lighting

- Measures: Outdoor lighting for recreational activities shall be limited to the proposed operating hours.

- Implementation Phase: Operation
- Monitoring Phase: Operation
- Enforcement Agency: LABOE and Department of Recreation and Parks

BMP-AES-4: Regulatory Requirements for Lighting

- Measures:
 - Project illumination shall comply with the provisions in the City's Municipal Code, including LAMC Chapter 1, Article 2, Sec. 12.21A5(k); LAMC Chapter 1, Article 7, Sec. 17.08C; and LAMC Chapter 9, Article 3, Section 93.0117.
 - The new walkway lighting shall be compliant with all regulations set forth by the City's Bureau of Street Lighting Design Standards and Guidelines to ensure that the area receives lighting that meets national illumination standards for vehicular and pedestrian traffic, does not emit light pollution, and produces little glare.
 - Lighting for sports fields and courts shall operate in compliance with Los Angeles City Recreation and Parks (RAP) illuminance level standards for outdoor sports and recreational facilities.
 - Lighting for security shall be illuminated in accordance with the Illuminating Engineering Society (IES) standards, IES RP-33-14 *Lighting for Exterior Environments* and IES G-1-03 *Security Lighting for People, Property and Public Spaces*, as updated by IES G-1-16 *Guide for Security Lighting for People, Property and Critical Infrastructure*.
- Implementation Phase: Design, Operation
- Monitoring Phase: Design, Operation
- Enforcement Agency: LADPW and Department of Recreation and Parks

Air Quality

BMP-AQ-1: SCAQMD Rules and Regulations

- Measures: The contractor shall implement measures to ensure that all construction activities are consistent with SCAQMD rules and regulations.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-AQ-2: Construction Worker Incentives

- Measures: The City shall offer ride-share and transit incentives for construction workers to reduce emissions associated with motor vehicle use.
- Implementation Phase: Construction
- Monitoring Phase: Construction

- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-AQ-3: Construction Equipment Maintenance

- Measures: The contractor shall maintain construction equipment by conducting regular tune-ups according to the manufacturers' recommendations.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

Biological Resources

BMP-BIO-1: Pre-Construction Wildlife Surveys

- Measures: Pre-construction wildlife surveys shall be completed by a qualified biologist no more than 48 hours prior to clearing, grubbing, or other construction activities to determine the presence/absence of wildlife species, including special-status species, within 100-feet of the construction area. Special attention will be focused on any existing burrowing, roosting, and nesting habitat within the Project Area. Surveys shall be repeated if construction activities are suspended for five days or more. If any wildlife species are identified, appropriate BMPs shall be developed and implemented to reduce potential impacts on these species, in consultation with regulatory agencies where appropriate.
- Implementation Phase: Prior to construction
- Monitoring Phase: Construction if construction activities are suspended for five days or more
- Enforcement Agency: LADPW (Project Biologist)

BMP-BIO-2: Trash and Construction Debris Removal

- Measures: All trash and construction debris shall be removed from the LA River construction areas on a daily basis. All water quality BMP materials shall be properly maintained during project construction and removed upon completion of construction activities. After completion of proposed construction activities, all construction equipment and materials shall be removed from the Project Area, and the Project Area shall be returned to pre-project conditions.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-BIO-3: Work Area Limitations

- Measures: No work for the Project shall be conducted on the Fourth Street Bridge or Seventh Street Bridge structures.
- Implementation Phase: Construction
- Monitoring Phase: Construction

- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-BIO-4: Nesting Bird Survey

- Measures: If vegetation trimming or clearing is conducted during the nesting season (typically February 15 through September 15), nesting bird surveys shall be completed by a qualified biologist within 300-feet of potential bird-nesting areas and 500-feet of potential raptor-nesting areas no more than 48 hours prior to trimming/removal activities to determine if nesting birds are within the affected vegetation. Surveys shall be repeated if trimming or removal activities are suspended for five days or more.
- Implementation Phase: Construction during the nesting season (February 15 through September 15)
- Monitoring Phase: None unless active nests are discovered
- Enforcement Agency: LADPW (Project Biologist)

BMP-BIO-5: Nesting Bird Buffer

- Measures: If nesting birds protected under the MBTA and California Fish and Game Code Sections are found in the Project Area, appropriate buffer consisting of orange flagging/fencing or similar (typically up to 300-feet for songbirds and 500-feet for raptors shall be installed and maintained until nesting activity has ended, as determined in coordination with the project biologist and regulatory agencies, as appropriate, to ensure that nesting birds and active nests are not harmed.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW (Project Biologist)

BMP-BIO-6: Hazardous Materials BMPs

- Measures: Appropriate hazardous material BMPs shall be implemented to reduce the potential for chemical spills or contaminant releases into the LA River, including any non-stormwater discharge.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-BIO-7: Equipment Maintenance

- Measures: All equipment refueling and maintenance shall be conducted in the staging area. In addition, vehicles and equipment shall be checked daily for fluid and fuel leaks, and drip pans shall be placed under all equipment that is parked and not in operation.
- Implementation Phase: Construction
- Monitoring Phase: Construction

- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-BIO-8: Regulatory Permits

- Measures: The City shall consult with the appropriate responsible resource agency (e.g., California Department of Fish and Wildlife [CDFW] and Regional Water Quality Control Board [RWQCB]) to determine permanent and temporary impact areas. Prior to undertaking ground-disturbing activities within or immediately adjacent to any aquatic resource areas, the City and/or their consultant shall obtain a Clean Water Act (CWA) Section 401 Water Quality Certification, and California Fish and Game Code Section 1602 Streambed Alteration Agreement.
- Implementation Phase: Prior to Construction
- Monitoring Phase: Construction
- Enforcement Agency: LABOE, LADPW, Contracts Administration Bureau, Construction Inspector

BMP-BIO-9: Pre-Construction Bat Surveys

- Measures: At least 30 days prior to construction, alterations to the LA River Access Tunnel shall be surveyed by a qualified biologist to assess the presence of bats or potential bat-roosting cavities. If bats or bat-roosting cavities are identified, then during the non-breeding and active season (typically October), bats shall be safely evicted, to the extent feasible, under the direction of a qualified biologist. Once it has been determined that all roosting bats have been safely evicted from roosting cavities, exclusionary devices shall be installed and maintained where appropriate to prevent bats from roosting in these cavities prior to construction.
- Implementation Phase: 30 days prior to construction
- Monitoring Phase: Survey work only
- Enforcement Agency: LADPW (Project Biologist)

BMP-BIO-10: Monitoring During LA River Access Tunnel Alteration

- Measures: In the event that all bats are not able to be excluded from affected roosting habitat, a qualified biologist shall monitor LA River Access Tunnel alterations. If bats are disturbed, work shall be safely suspended until all bats leave the vicinity on their own, or alternative measures can be identified under the direction of a qualified biologist. Work shall resume only once the bats have left the site and/or approval to resume work is given by a qualified biologist.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW (Project Biologist)

BMP-BIO-11: Bat Monitoring

- Measures: In the event that all bats are not able to be excluded from affected roosting habitat, a qualified biologist shall monitor structure alteration activities. If bats are disturbed, work shall be safely suspended until all bats leave the vicinity of the LA River Access Tunnel on their own, or alternative measures shall be identified under the direction of a qualified biologist. Work shall

resume only once the bats have left the site and/or approval to resume work is given by a qualified biologist.

- Surveys and exclusion measures are expected to prevent maternal colonies from becoming established in structures to be removed or altered. In the event that a maternal colony of bats is found, no work shall be conducted within 100-feet of the maternal roosting site until the maternal season is over or the bats have left the site, or as otherwise directed by a qualified biologist. The site shall be designated as a sensitive area and protected as such until the bats have left the site. No activities shall be authorized adjacent to the roosting site. Combustion equipment, such as generators, pumps, and vehicles, shall not be parked or operated under or adjacent to the roosting site. Construction personnel shall not be authorized to enter areas beneath the colony, especially during the evening exodus.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW (Project Biologist)

Cultural Resources

BMP-CUL-1: Archeological Monitoring During Excavation

- Measures: A qualified archaeological monitor shall conduct archaeological monitoring in the West Park and East Park for excavations at depths greater than 5-feet. Monitoring efforts may be reduced or eliminated for those portions of the Project Area shown to have been recently disturbed by construction activities associated with the Sixth Street Viaduct Project.
- Implementation Phase: Construction activities involving excavations greater than 5-feet
- Monitoring Phase: Construction activities involving excavations greater than 5-feet
- Enforcement Agency: LADPW

BMP-CUL-2: Tribal Cultural Resources Sensitivity Training

- Measures: The City shall invite a qualified tribal representative from the Gabrieleño Band of Mission Indians to a pre-construction meeting to provide a training session to the construction contractor regarding potential tribal resources that could be encountered during construction activities and procedures to follow should a tribal resource be encountered.
- Implementation Phase: Prior to construction
- Monitoring Phase: Prior to construction
- Enforcement Agency: LABOE and qualified Tribal representative from the Gabrieleño Band of Mission Indians

BMP-CUL-3: Tribal Cultural Resources Monitoring During Excavation

- Measures: The City shall retain and compensate for the services of a tribal monitor who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the California Native American Heritage's (NAHC) Tribal Contact list for the Project Area.

The Tribal monitor shall only be present on-site during the construction phases that involve ground-disturbing activities in the proposed Arts Plaza. Monitoring efforts may further be reduced or eliminated for those portions of the in the proposed Arts Plaza that (1) are underlain with artificial fill of known origin, (2) require superficial scraping of land at depths less than 5-feet, or (3) are demonstrated to have been recently disturbed by construction activities associated with the Sixth Street Viaduct Project. The on-site monitoring shall cease when the grading and excavation activities in the proposed Arts Plaza are completed, or when the Tribal representatives and monitor have indicated that the site has a low potential for impacting tribal cultural resources.

- Implementation Phase: Construction
- Monitoring Phase: Construction activities involving ground-disturbing activities in the proposed Arts Plaza
- Enforcement Agency: LADPW (Tribal Monitor)

BMP-CUL-4: Unanticipated Discovery of Archaeological and Tribal Cultural Resources

- Measures: In the event that potentially significant buried archaeological materials are encountered within the Project Area, all work in the vicinity must stop until the archaeological and Tribal monitor can visit the site and assess the significance of the resource. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the City regarding treatment and curation of these resources. Work may continue on other parts of the Project Area while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]).
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW (Tribal Monitor)

BMP-CUL-5: Unanticipated Discovery of Human Remains

- Measures: Health and Safety Code Section 7050.5, Section 15064.5(e) of the CEQA Guidelines, and PRC Section 5097.98 mandate the process to be followed in the unlikely event of an unanticipated discovery of human remains in a location other than a dedicated cemetery. The Los Angeles County Coroner must be notified within 24 hours of the discovery of potentially human remains. The Coroner must then determine within two working days of being notified if the remains are subject to his or her authority.
 - If the Coroner recognizes the human remains (including bone fragments and funerary objects) to be Native American, he or she must contact the NAHC by phone within 24 hours. The NAHC then designates a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification. The MLD will then have the opportunity to recommend to the Project proponent means for treating or disposing of, with appropriate dignity, the human remains and associated grave goods within 24 hours of notification.
- Implementation Phase: Construction

- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

Geology and Soils

BMP-GEO-1: Erosion Control

- Measures: The contractor shall implement standard BMPs, such as the use of fiber rolls and silt fencing, to reduce the amount of dust and dirt from leaving the construction area.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-GEO-2: Geotechnical Site Investigation Recommendations

- Measures: The Geotechnical Site Investigation report for the Project includes recommendations to ensure that the Project Area is suitable for construction, and to ensure that appropriate measures are taken to reduce impacts during earthwork, excavation, utility trenching, backfilling, and other construction activities (Hushmand Associates, Inc., 2018). Backfill soils shall be moisture-conditioned and recompacted to meet ASTM International standards to counteract the potential adverse effects of soil expansiveness. If import soils are used, the import soil shall not exhibit an Expansion Index greater than 20 or contain more than 35 percent fines (i.e., fine-grained soils), and shall be screened by the geotechnical engineer to meet ASTM International standards.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-PAL-1: Paleontological Sensitivity Training

- Measures: Prior to the start of construction, all field personnel shall be briefed regarding the types of fossils that could be found and the procedures to follow should paleontological resources be encountered. Specifically, the training shall provide a description of the fossil resources that may be encountered, outline steps to follow when a fossil discovery is made and provide contact information for a qualified paleontologist. The training shall be developed by a qualified paleontologist and provided as hand-outs or a PowerPoint Presentation that may be presented concurrently with other pre-construction training.
- Implementation Phase: Prior to construction
- Monitoring Phase: Prior to construction
- Enforcement Agency: LADPW (Project Paleontologist), Contracts Administration Bureau, Construction Inspector

BMP-PAL-2: Unanticipated Paleontological Resource Discoveries

- Measures: In the event that an unanticipated fossil discovery is made during construction, a qualified professional paleontologist shall be retained to examine the find and to determine whether further paleontological resource mitigation is warranted in accordance with Society of Vertebrate Paleontology (2010) guidelines.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW (Project Paleontologist)

Greenhouse Gas Emissions

BMP-GHG-1: Off-Road Equipment Construction Requirements

- Measures: Idling shall be limited for vehicles and off-road equipment. Off-road equipment shall meet Tier 4 emission standards and newer. Efficient on-road haul trucks shall be used, where practicable.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

Hazards and Hazardous Materials

BMP-HAZ-1: Coordination with Regulatory Agencies

- Measures: The City shall coordinate with Metro, U.S. EPA, and DTSC during construction activities to minimize health risks to the public or the environment associated with ongoing cleanup actions within the Project Area.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LABOE

BMP-HAZ-2: Compliance with SCAQMD Rules and Regulations

- Measures: The contractor shall implement measures to ensure that all construction activities are consistent with SCAQMD rules and regulations, including Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil and Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

Hydrology and Water Quality

BMP-HYDRO-1: Construction Drainage Design

- Measures: The Project shall incorporate drainage designs that direct stormwater runoff or irrigation runoff away from structures or the top of the slopes. No stormwater will be allowed to discharge over the top of a cut or fill slope.
- Implementation Phase: Design and Construction
- Monitoring Phase: Design and Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-HYDRO-2: Off-Site Sediment Transport

- Measures: All entrances and exits to the construction site shall be stabilized to reduce transport of sediment off-site. Any sediment or other materials tracked off-site shall be removed within a reasonable time.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-HYDRO-3: Storm Drain Message and Signage

- Measures: Existing and proposed storm drain catch basins within the vicinity of the Project Site shall be marked and maintained.
- Implementation Phase: Construction and Operation
- Monitoring Phase: Construction and Operation
- Enforcement Agency: Construction Contractor (Construction), LADPW (Operation)

BMP-HYDRO-4: Outdoor Material Storage Area Design

- Measures: Proposed outdoor storage areas shall be organized and maintained to prevent stored materials from being permitted to runoff with stormwater. The outdoor storage of toxic and hazardous materials is not permitted.
- Implementation Phase: Construction and Operation
- Monitoring Phase: Construction and Operation
- Enforcement Agency: Construction Contractor (Construction), LADPW (Operation)

BMP-HYDRO-5: Outdoor Trash Storage Area Design

- Measures: Proposed outdoor trash storage enclosures shall be organized and maintained to prevent the transportation of trash and debris in stormwater. Bins and dumpsters shall remain covered.
- Implementation Phase: Construction and Operation

- Monitoring Phase: Construction and Operation
- Enforcement Agency: Construction Contractor (Construction), LADPW (Operation)

BMP-HYDRO-6: Employee Training

- Measures: Operations and maintenance employees shall be trained and made aware of the source controls, LID BMPs, educational materials, and maintenance requirements for the Project at first hire and yearly thereafter.
- Implementation Phase: Construction and Operation
- Monitoring Phase: Construction and Operation
- Enforcement Agency: LADPW (Construction), RAP (Operation)

BMP-HYDRO-7: Common Area Landscape Management

- Measures: A landscape maintenance program shall be established prior to construction in order to optimize water efficiency, limit pollutant introduction from fertilizers and pesticides, manage landscape waste, and prevent soil erosion.
- Implementation Phase: Prior to Construction and Operation
- Monitoring Phase: Operation
- Enforcement Agency: LADPW (Prior to Construction), RAP (Operation)

BMP-HYDRO-8: Common Area Litter Control

- Measures: A waste management program shall be implemented to inspect the Project Site for litter and pick up any litter as necessary on a regular basis.
- Implementation Phase: Construction and Operation
- Monitoring Phase: Operation
- Enforcement Agency: Construction Contractor (Construction), RAP (Operation)

BMP-HYDRO-9: Common Area Catch Basin Inspection

- Measures: Catch basins shall be inspected and maintained, at a minimum, yearly and prior to the rainy season.
- Implementation Phase: Construction and Operation
- Monitoring Phase: Construction and Operation
- Enforcement Agency: Construction Contractor (Construction), LADWP (Construction), RAP (Operation)

BMP-HYDRO-10: Street Sweeping Parking Lots

- Measures: The angled parking spaces along Anderson Street shall be vacuum swept, at a minimum, yearly and prior to the rainy season.
- Implementation Phase: Operation

- Monitoring Phase: Operation
- Enforcement Agency: RAP

BMP-HYDRO-11: BMP Maintenance

- Measures: Proposed structural source controls, non-structural source controls, and LID BMPs shall be maintained as outlined in the Operations and Maintenance Plan that would be developed for the Project.
- Implementation Phase: Operation
- Monitoring Phase: Operation
- Enforcement Agency: LADPW and RAP

BMP-HYDRO-12: Structural and Low-Impact Development (LID) BMPs

- Measures:
 - Runoff from the Project Site and tributary Viaduct areas shall be captured by proposed stormwater drainage systems, routed to a variety of structural and LID BMPs and discharged to the existing stormwater drainage facilities adjacent to the site. In addition, the Project Site shall include a combination of paved surfaces and landscaped areas to provide soil stability and further minimize erosion.
 - Structural BMPs (i.e., hydrodynamic separators) shall be installed to treat the runoff from the Viaduct to the maximum extent practicable
 - The remaining localized rainfall falling on the portion of the Project Site outside of the Viaduct's footprint shall be treated through a combination of incidental infiltration during sheet flow along pervious land areas, incidental infiltration within localized vegetated basins, and below-grade capture and use systems below some of the proposed lawn areas in areas with a larger impervious area footprint. The incidental infiltration or capture and use of the stormwater will remove pollutants of concern. Larger storm events will be captured and conveyed through proposed local storm drainage systems to new connections to the existing storm drainage system.
- Implementation Phase: Construction and Operation
- Monitoring Phase: Construction and Operation
- Enforcement Agency: LABOE, LADWP, and the Construction Contractor

BMP-HYDRO-13: Regulatory Requirements for Water Quality

- Measures:
 - To comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) MS4 Permit, the Project shall implement a Stormwater Pollution Prevention Plan (SWPPP) that includes construction site BMPs to control erosion and sedimentation. BMPs include silt fencing, fiber rolls, sandbag barriers, drainage inlet protections, and berms at the top of all

grade slopes. The SWPPP shall also include post-construction stormwater management measures to control pollutants in stormwater discharges during operation of the Project.

- If groundwater is encountered, the contractor shall develop a dewatering plan, and a Dewatering Permit with the Los Angeles RWQCB will also be required. Should dewatering be required, the Project shall comply with the General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.
- Proposed construction activities shall comply with all applicable federal, state, and local requirements to reduce the potential for the release of hazardous waste and other contaminants into groundwater. In addition, construction activities will be subject to the provisions of the CWA and Porter-Cologne Act; and other federal, state, and local requirements to ensure that stormwater pollutants resulting from construction will not substantially degrade water quality.
- A water diversion plan is not anticipated for the Project because Phase II construction activities shall be performed during the dry season (April 15 through October 15). However, if work in a flowing stream is unavoidable, a water diversion plan shall be required, and the entire stream flow shall be diverted around the work area by a barrier, temporary culvert, new channel, or other means approved by the CDFW. Should water diversion be necessary, a 401/404 permit will also be required.
- An emergency evacuation plan shall be prepared for Phase II construction within the LA River. If measurable rain with 25 percent or greater probability is predicted within 72 hours during project-related activities, all activities within the LA River shall cease and protective measures to prevent siltation/erosion shall be implemented/maintained. With the implementation of BMPs, alterations to drainage patterns during construction in the LA River channel will not result in substantial erosion or siltation onsite or offsite.
- A Notice of Intent (NOI) for stormwater discharges associated with construction activities may also be required under the NPDES General Permit.
- Stormwater BMPs shall follow the latest California Stormwater Quality Association's Stormwater Best Management Practices Handbook. All entrances and exits to a construction site will be stabilized to reduce transport of sediment off-site. Any sediment or other materials tracked off-site will be removed within a reasonable time.
- Any non-stormwater discharge shall be controlled and properly disposed of through the sanitary sewer system or transported to an approved processing facility to prevent the contamination of site soils and groundwater.
- The handling, storage, and disposal of contaminants shall comply with all applicable federal, state, and local requirements. The Project Site shall be remediated to standards acceptable to LACoFD and other regulatory agencies as required, thereby reducing the area affected by contaminants.
- Implementation Phase: Prior to Construction

- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

Land Use and Planning

BMP-LAND-1: Coordination with Los Angeles City Planning

- Measures: LABOE shall continue to work with the Los Angeles Department of City Planning to ensure that the Project is consistent with future zoning changes.
- Implementation Phase: Ongoing
- Monitoring Phase: Ongoing
- Enforcement Agency: LABOE

BMP-LAND-2: Coordination with Viaduct Replacement Project

- Measures: Any necessary land use entitlements shall be secured prior to the start of construction activities and shall be coordinated with construction and maintenance of the Viaduct Replacement Project as needed.
- Implementation Phase: Prior to Construction
- Monitoring Phase: Prior to Construction
- Enforcement Agency: LABOE and LADWP

BMP-LAND-3: Construction Area

- Measures: Construction equipment, materials storage, and construction activities shall be contained within the limits of construction, and construction areas shall be fenced.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

Noise and Vibration

BMP-NOISE-1: Construction Equipment Requirements

- Measures: Construction equipment shall be properly maintained and equipped with mufflers.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

Transportation and Traffic

BMP-TRANS-1: Temporary Detour Routes

- Measures: During proposed construction activities, temporary detours shall be provided for any affected pedestrian and bicycle facilities.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-TRANS-2: Construction Staging Plan

- Measures: A construction staging plan shall be developed to reduce impacts related to noise, dust, traffic, and other health hazards. In addition, construction site BMPs (e.g., fencing, signs, and detours) shall be implemented to minimize hazards and prevent safety issues on the roadways and sidewalks surrounding the construction site.
- Implementation Phase: Prior to construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-TRANS-3: Construction Traffic

- Measures: Construction-related trips shall be scheduled with increased frequency during off-peak hours to minimize impacts to commuters.
- Implementation Phase: Prior to construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-TRANS-4: Access to Parcels

- Measures: If access to any existing parcels are removed during proposed construction activities, temporary access shall be provided, and/or new points of access shall be constructed.
- Implementation Phase: Prior to construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-TRANS-5: Site-Specific Traffic Control and Transit Plan for Large Events

- Measures: Large event permittees shall develop a site-specific traffic control plan to provide information on parking and circulation and highlight transit options for event attendees to minimize congestion and vehicle miles traveled. Traffic control strategies for events will include inbound/outbound flex lanes and sheriff-controlled intersections. Traffic control plans will also identify nearby public parking facilities and identify passenger pick-up/drop-off locations.

Permittees will be required to consider the cumulative traffic impacts of their event in relation to other events in the Project Area. The traffic control plans will also identify emergency services egress and access.

- Implementation Phase: Operation (larger events)
- Monitoring Phase: Operation (larger events)
- Enforcement Agency: LABOE, RAP, and Individual Permittees

Utilities and Service Systems

BMP-USS-1: Wastewater Treatment

- Measures: Any wastewater produced as a result of proposed construction activities, such as water containing diesel and oil, paint, solvents, cleaners, and other chemicals, as well as construction debris and dirt, shall be collected in settlement tanks and screened. The clean water shall be discharged, and the remaining sludge shall be disposed of in accordance with water and solid waste disposal regulations, including the CWA, the Porter-Cologne Water Quality Control Act, and the RCRA.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-USS-2: Temporary Stormwater Drainage Measures

- Measures: Temporary stormwater drainage measures to prevent polluted runoff in the construction site shall include, but not be limited to, the installation of earth dikes, drainage swales, and ditches, silt fences, desilting basins, and stormwater drain inlet protection.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADPW, Contracts Administration Bureau, Construction Inspector

BMP-USS-3: Coordination with Service Providers

- Measures: The location of underground utilities shall be confirmed prior to proposed construction activities by contacting the Underground Service Alert of Southern California (DigAlert). If necessary, the City shall work in close coordination with utility providers to develop a relocation plan to minimize possible impacts and disruption to service utilities.
- Implementation Phase: Prior to Construction
- Monitoring Phase: Prior to Construction and Ongoing
- Enforcement Agency: LADPW

BMP-USS-4: Reduced Consumption of Water Resources

- Measures: Design features to reduce the consumption of water resources shall be implemented, such as low-flow water fixtures and water efficient irrigation design and practices. In addition, drought-tolerant landscaping shall be planted to further reduce water consumption.
- Implementation Phase: Design
- Monitoring Phase: Design
- Enforcement Agency: LADPW

BMP-USS-5: High voltage electrical conductors

- Measures: The ROW contains high-voltage electrical conductors. Only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following, shall be used: California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders, and California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.
- Implementation Phase: Construction
- Monitoring Phase: Construction
- Enforcement Agency: LADWP