
V. MITIGATION MONITORING PROGRAM

MITIGATION MONITORING PROGRAM PROCEDURES

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The Los Angeles Memorial Coliseum Commission (“Coliseum Commission”) is the Lead Agency for the Los Angeles Memorial Coliseum Project. As such, the Coliseum Commission is the responsible public agency for ensuring the mitigation measures identified herein are enforced and implemented. As appropriate, other governmental agencies may be identified as the responsible agency for ensuring measures relative to their jurisdictional function are implemented through the appropriate level of agency review and/or permitting processes.

This Mitigation Monitoring Program (MMP) is designed to monitor implementation of all mitigation measures which have been adopted for the Proposed Project. As detailed on the following pages, each required mitigation measure for the proposed project is listed and categorized by impact area, with accompanying discussion of:

- Implementation Phase, the phase of the project during which the mitigation measure shall be applied either during Pre-Construction (including the design phase), Construction, or Occupancy (Post-construction).
- The Monitoring Phase, the phase of the project during which the measure shall be overseen.
- The Enforcement Agency, the agency with the power to enforce the mitigation measure in terms of compliance, implementation and development.

The MMP for the Los Angeles Memorial Coliseum will be in place throughout all phases of the project. The Commission’s existing land management processes will be used as the basic foundation for the MMP procedures and will also serve to provide the documentation for the reporting program.

The substance and timing of each certification report that is submitted to the Commission shall be at the discretion of the Commission. Generally, compliance reports shall be submitted to the Commission in a timely manner following completion/implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The Commission in conjunction with the project applicant shall assure that project construction occurs in accordance with the MMP. The South Coast Air Quality Management District

(SCAQMD) shall be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation. Departments listed below are all departments of the City of Los Angeles, unless otherwise noted.

MITIGATION MEASURES

1. AESTHETICS

Visual Impacts

No mitigation measures are required.

Light and Glare

No mitigation measures are required.

2. AIR QUALITY

Required Construction Phase Mitigation

The following measures are recommended to reduce short-term impacts related to construction activities. Mitigation measures shall be included in all contracts between the applicant and project contractors to assure compliance with the following:

- 1. Haul trucks shall be staged on-site in the vacant parking areas within Exposition Park. Haul truck staging plan shall be subject to review by the City of Los Angeles Department of Building and Safety and the Department of Transportation. Trucks shall be called to the site by radio dispatch.

Implementation Phase:	Construction
Monitoring Phase:	Construction
Enforcement Agency:	SCAQMD, LADOT

- 2. Diesel-powered equipment shall be located as far away as possible from sensitive land uses and areas. Specifically, diesel compressors, pumps and other stationary machinery shall be located to the extent feasible on the south side of the Coliseum or within the interior of the Coliseum to avoid air pollution impacts on passive recreational spaces in Exposition Park (such as the area north of the Coliseum and south of the museum complex).

Implementation Phase:	Construction
Monitoring Phase:	Construction
Enforcement Agency:	SCAQMD, Coliseum Commission

- 3. Grading activities shall be restricted on exceedingly windy days (winds in excess of 25 mph) when fugitive dust emissions are likely to be carried off-site. All truck loads of export debris shall be covered or shall provide at least 2 feet of freeboard.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: SCAQMD

- 4. Ground wetting shall be required in accordance with SCAQMD Rule 403 for dust control during grading and construction.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: SCAQMD, Coliseum Commission

- 5. Contractors shall cover any stockpiles of soil, sand and similar materials.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: SCAQMD, Coliseum Commission

- 6. Equipment engines shall be maintained in proper tune.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: SCAQMD, Coliseum Commission

- 7. Construction equipment shall be shut off to reduce idling when not in direct use for extended periods of time.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: SCAQMD, Coliseum Commission

- 8. Contractors shall discontinue construction activities during second-stage smog alerts.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: SCAQMD, Coliseum Commission

Operational Phase Mitigation

1. To reduce the traffic-related air quality impact on the affected intersections, the Proposed Project shall implement the required traffic management measures described in Section IV.C.6 of this report, Traffic, Parking, and Access.

Implementation Phase: Operation
Monitoring Phase: Operation
Enforcement Agency: LADOT, Coliseum Commission

2. The Proposed Project applicant shall comply with all requirements of the South Coast Air Quality Management District’s Regulation 15, which attempts to reduce employee vehicle trips through the implementation of various transportation management strategies.

Implementation Phase: Construction, Operation
Monitoring Phase: Construction, Operation
Enforcement Agency: SCAQMD, Coliseum Commission

3. CULTURAL RESOURCES

The following mitigation measures are recommended to reduce the Proposed Project’s impact upon historic resources. Mitigation measures shall be included in all contracts between the applicant and Project contractors to assure compliance with the following:

1. Recordation. Demolition of any historic fabric shall be documented in a report consistent with Historic American Buildings Survey (HABS) standards. The report shall document the significance and physical condition of the historic resources proposed for demolition, both historic and current, photographs, written data, and text. The documentation shall include:
 - a. A brief written historic and descriptive report shall be completed in narrative format, including an architectural data form.
 - b. A site plan on 8" x 11" paper showing the location of the buildings should be included. This site plan shall include a photo-key.
 - c. A sketch floor plan on 8" x 11" paper shall accompany each architectural data form.
 - d. Large format (4" x 5" or larger negative size) photographs in accordance with HABS guidelines. Views shall include several contextual views, all exterior elevations,

detailed views of significant exterior architectural features, and interior views of significant historical architectural features or spaces.

- e. Field photographs (35mm) based on HABS guidelines. Views as detailed in large format photographs.
- f. The report shall include copies or prints of any available original plans and historic photographs.
- g. Archival stable reproductions of any available significant historic construction drawings and photographs.
- h. Archival copies of the documentation shall be submitted to the Los Angeles Memorial Coliseum Commission.

Implementation Phase:	Pre-construction
Monitoring Phase:	Pre-construction
Enforcement Agency:	Coliseum Commission

- 2. In accordance with Standard 7 of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, the surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning materials that will damage the historic building materials shall not be undertaken.

Implementation Phase:	Construction
Monitoring Phase:	Construction
Enforcement Agency:	Coliseum Commission

- 3. The Proposed Project shall be constructed in substantial compliance with the Conceptual Historic Fabric Retention Plan, as depicted in Figure III-3 of this EIR.

Implementation Phase:	Pre-Construction, Construction
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Coliseum Commission

4. GEOLOGY/SEISMIC HAZARDS

The following mitigation measures are required in order to effect a reduction in the severity of potential on-site impacts resulting from seismic events occurring on Southern California faults:

1. All structures to be constructed or renovated as part of the Proposed Project shall be designed as required by either the Uniform Building Code for structures within Seismic Zone 4, or other pertinent State and/or City building codes (such as Division 23, Section 91.2305 of the City of Los Angeles Building Code), to withstand the expected ground motions.

Implementation Phase: Pre-Construction, Construction
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Bureau of Engineering, Department of Building and Safety

2. A comprehensive geotechnical investigation shall be prepared to the satisfaction of the responsible State and/or City reviewing agencies. The investigation shall verify the soil conditions under the proposed structures and derive the pile capacities.

Implementation Phase: Pre-Construction, Construction
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Bureau of Engineering, Department of Building and Safety

3. All grading activities shall be in compliance with specific recommendations and requirements provided in the geotechnical report prepared for the Proposed Project, subject to review and approval by the appropriate State and/or City responsible agencies.

Implementation Phase: Pre-Construction, Construction
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Bureau of Engineering, Department of Building and Safety

4. A copy of the foundation report and/or supplements and approval letter shall be attached to the State and/or City office and field sets of plans, with one copy of the foundation report and/or supplements submitted to the State and/or City plan checker prior to the issuance of the permit.

Implementation Phase: Pre-Construction
Monitoring Phase: Pre-Construction
Enforcement Agency: Bureau of Engineering, Department of Building and Safety

5. During construction, all grading shall be carefully observed, mapped, and tested by the project engineer. All grading shall be performed under the supervision of a certified engineering geologist and/or soils engineer in accordance with the applicable provisions of the State and/or City Building Codes to the satisfaction of the State and/or City building and safety authorities. The responsible engineer shall review and approve the foundation plan and/or the excavation/shoring plan prior to the issuance of any permits.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: Bureau of Engineering

6. Artificial fills in the existing 35-foot earth berm shall not be considered suitable for the support of foundations unless excavated, recompacted, and tested to be in compliance with the applicable State and/or City Grading Codes.

Implementation Phase: Pre-Construction, Construction
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Bureau of Engineering, Department of Building and Safety

7. The geologist or the soils engineer shall inspect and approve all fill and subdrain placement areas prior to placing fill.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: Bureau of Engineering

8. Haul route approval for the transport of graded and excavated earth materials and removed building materials to receptor sites and/or local landfills shall be obtained from the City of Los Angeles Department of Building and Safety and/or other responsible City agencies. Haul routes for the transport of such materials shall be established, where possible, through non-residential areas so as to minimize the effects of noise, and shall maximize, where possible, the distance traveled on major arterials.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety, LADOT

9. Discarded building and/or earth materials containing any hazardous materials, primarily asbestos, shall be disposed of in accordance with all applicable local, state, and federal regulations.

Implementation Phase: Pre-construction, Construction
Monitoring Phase: Pre-construction, Construction
Enforcement Agency: Bureau of Engineering, Department of Building and Safety

10. To the maximum extent feasible, uncontaminated graded materials shall be transported off-site to a receptor site needing imported fill material. Landfills shall only be considered as a last resort disposal option for materials from the site.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: Coliseum Commission

11. Prior to the issuance of building permits, if the soils and/or perched groundwater beneath the site are found to be contaminated, the City of Los Angeles Fire Department shall be notified and provided with a summary of all local, state, county, and federally required remediation activities and submit evidence of compliance.

Implementation Phase: Pre-construction
Monitoring Phase: Pre-construction
Enforcement Agency: Coliseum Commission, Department of Building and Safety, LAFD

12. Where encountered on the site, perched groundwater or saturated soils should be removed to the extent feasible or necessary.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: Coliseum Commission, Department of Building and Safety, LAFD

13. During the construction plan and haul route approval process, the project contractor shall consult with the LAUSD Transportation Branch (tel: (323) 342-1400), to address potential impacts upon existing pedestrian and school bus routes. Contractors must guarantee that safe and convenient pedestrian routes to school are maintained. The project contractor shall install appropriate traffic controls (signs and signals) as needed to ensure pedestrian and vehicular safety. The project contractor shall fund crossing guards for safety of students, as needed, during construction activities at impacted crossings.

Implementation Phase: Pre-Construction
Monitoring Phase: Construction
Enforcement Agency: Coliseum Commission, Department of Building and Safety

5. LAND USE

No mitigation measures are required.

6. NOISE

1. The Applicant shall comply with the construction hours as specified by the City LAMC Noise Ordinance, Chapter IV, Section 41.40., which prohibits construction before 7:00

a.m. or after 6:00 p.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday or any national holiday, and at anytime on Sunday.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: Coliseum Commission

- The Applicant shall prepare a construction-related traffic plan detailing proposed haul routes and staging areas for the transportation of materials and equipment, with consideration for sensitive uses in the neighborhood. A traffic and parking plan for the construction phase will be submitted for approval by LADOT and the Department of Building and Safety prior to the issuance of any permits.

Implementation Phase: Pre-Construction
Monitoring Phase: Pre-Construction
Enforcement Agency: Coliseum Commission, LADOT

- Adjacent museums and residents shall be given regular notification of major construction activities and their durations. A visible and readable sign (at a distance of 50 feet) shall be posted on the construction site identifying a telephone number where residents can inquire about the construction process and register complaints.

Implementation Phase: Pre-Construction
Monitoring Phase: Pre-Construction
Enforcement Agency: LADOT, Coliseum Commission

- During construction, the Project contractors shall muffle and shield intakes and exhaust, shroud and shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible.

Implementation Phase: Construction
Monitoring Phase: Construction
Enforcement Agency: Coliseum Commission

- The perimeter of the Project Site (including the ancillary outbuildings proposed to be demolished) shall be enclosed with a temporary barrier wall for security and noise protection purposes. This barrier wall shall consist of a solid, heavy vinyl material or 3/4-inch plywood positioned to block direct line of sight from the active construction areas and other open space areas and sensitive uses within Exposition Park.

Implementation Phase:	Construction
Monitoring Phase:	Construction
Enforcement Agency:	Coliseum Commission

7. PUBLIC SERVICES

Fire

No mitigation measures are required.

Police

The following mitigation measures are recommended to ensure that an adequate level of police protection continues to be provided on the Project Site during Coliseum events:

1. Plot plans for the proposed renovation shall be submitted to the Los Angeles Police Department's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented to the extent feasible.

Implementation Phase:	Pre-Construction
Monitoring Phase:	Pre-Construction
Enforcement Agency:	Coliseum Commission, LAPD

2. Building plans shall be filed with the LAPD Southwest Area Commanding Officer. Plans shall include access routes, floor plans, evacuation routes, and any additional information that might facilitate prompt and efficient police response.

Implementation Phase:	Pre-Construction, Construction, Operation
Monitoring Phase:	Pre-Construction, Construction, Operation
Enforcement Agency:	Department of Building and Safety, LAPD

3. Security features shall be provided on the construction site(s), such as guards, fencing, and locked entrances.

Implementation Phase:	Construction
Monitoring Phase:	Construction
Enforcement Agency:	Coliseum Commission, LAPD

- 4. Landscaping shall not be planted in a way that could provide cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking lot users.

Implementation Phase: Pre-Construction, Construction, Operation
Monitoring Phase: Pre-Construction, Construction, Operation
Enforcement Agency: Coliseum Commission, LAPD

- 5. Additional lighting shall be installed where appropriate as determined in consultation with the LAPD.

Implementation Phase: Pre-Construction, Construction, Operation
Monitoring Phase: Pre-Construction, Construction, Operation
Enforcement Agency: Coliseum Commission, LAPD

- 6. Safety features shall be incorporated into Proposed Project to assure pedestrian safety, assist in controlling pedestrian traffic flows, and avoid pedestrian/vehicular conflicts on-site. Safety measures may include provision of security and traffic control personnel; clearly designated, well-lighted pedestrian walkways on-site; special street and pedestrian-level lighting; physical barriers (e.g., low walls, landscaping), particularly around the perimeter of the Coliseum, to direct pedestrians to specific exit locations that correspond to designated crosswalk locations on adjacent streets.

Implementation Phase: Pre-Construction, Construction, Operation
Monitoring Phase: Pre-Construction, Construction, Operation
Enforcement Agency: Coliseum Commission, Building and Safety, LAPD

- 7. A Security Plan shall be developed and implemented by the Applicant, in consultation with the LAPD, outlining the security services and features to be provided in conjunction with the Proposed Project. Security features may include but are not limited to the provision of a private on-site security force, implementation of a surveillance system, installation of locks and alarms on entryways where appropriate, security and parking lot lighting, "spotters" to survey parking lots, and maximum accessibility for emergency service personnel. The plan shall be reviewed by the LAPD, and any provisions pertaining to access shall be subject to review by the LADOT. A copy of the Plan shall be provided to the LAPD Southwest Area Commanding Officer.

Implementation Phase: Pre-Construction, Construction, Operation
Monitoring Phase: Pre-Construction, Construction, Operation
Enforcement Agency: Coliseum Commission, Building and Safety, LAPD, LADOT

- 8. An Emergency Procedures Plan shall be established and implemented by the Applicant outlining guidelines and procedures in the event of civil disturbance, evacuation, and other types of emergencies. The plan shall be subject to review by the LAPD, and any provisions pertaining to access shall be subject to review by the LADOT. A copy of the Plan shall be provided to the LAPD Southwest Area Commanding Officer.

Implementation Phase: Pre-Construction, Construction, Operation
Monitoring Phase: Pre-Construction, Construction, Operation
Enforcement Agency: Coliseum Commission, Building and Safety, LAPD, LAFD

- 9. Traffic control personnel may be provided on adjacent roadways and in parking areas during Coliseum events and immediately preceding and following events to help prevent vehicles and pedestrians from obstructing emergency access.

Implementation Phase: Operation
Monitoring Phase: Operation
Enforcement Agency: Coliseum Commission, Los Angeles Police Department, LADOT

In addition to the foregoing recommendations and requirements, measures recommended and/or required under Section V.I, Traffic, Access, and Parking shall be implemented as appropriate.

8. PUBLIC UTILITIES

Energy Conservation

No significant impacts upon electricity or natural gas resources or infrastructure systems have been identified, thus no mitigation measures are required. Nevertheless, the LADWP recommends the following measures be incorporated into the final design as feasible, to reduce the Project’s demands for energy resources.

- 1. During the design process, the applicant should consult with the Los Angeles Department of Water and Power, Efficiency Solutions Business Group, regarding possible energy efficiency measures. The applicant shall incorporate measures to meet or, if possible, exceed minimum efficiency standards for Title XXIV of the California Code of Regulations.

Implementation Phase: Pre-Construction, Construction, Operation
Monitoring Phase: Pre-Construction, Construction, Operation
Enforcement Agency: Coliseum Commission

Water Conservation

To reduce impacts to less than significant levels, the following mitigation measures are required:

1. The Project Applicant shall be required to comply with any improvements necessary to meet Los Angeles Fire Department fire-flow requirements for the Proposed Project.

Implementation Phase:	Pre-Construction, Construction, Operation
Monitoring Phase:	Pre-Construction, Construction, Operation
Enforcement Agency:	Coliseum Commission, LAFD

2. The Proposed Project shall incorporate water saving techniques as required by the City of Los Angeles' mandatory water conservation program (Ordinance Nos. 166,080 and 163,532). Water conservation measures described in the ordinance include, but are not limited to, the following:

- a. As necessary, the Project Site shall be landscaped with drought-tolerant/indigenous species (xeriscape).
- b. Low flow flush valves and shower head water-conservation devices shall be installed in all restroom and/or locker room facilities.

Implementation Phase:	Construction, Operation
Monitoring Phase:	Construction, Operation
Enforcement Agency:	Coliseum Commission

In addition, the City of Los Angeles Department of Water and Power recommends the following water conservation measures:

3. Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

Implementation Phase:	Construction, Operation
Monitoring Phase:	Construction, Operation
Enforcement Agency:	Coliseum Commission

4. Reclaimed water should be investigated as a source to irrigate large landscaped areas, including the grass playing field.

Implementation Phase:	Construction, Operation
Monitoring Phase:	Construction, Operation
Enforcement Agency:	Coliseum Commission

- 5. On-site recycling of drainage from water used for playing field irrigation should be investigated.

Implementation Phase: Construction, Operation
Monitoring Phase: Construction, Operation
Enforcement Agency: Department of Water and Power

- 6. Recirculating hot water systems which can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet should be investigated.

Implementation Phase: Construction, Operation
Monitoring Phase: Construction, Operation
Enforcement Agency: Coliseum Commission

- 7. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

Implementation Phase: Construction, Operation
Monitoring Phase: Construction, Operation
Enforcement Agency: Coliseum Commission

Sanitary Sewers

No mitigation measures are required.

Solid Waste

No mitigation measures are required.

9. TRAFFIC, ACCESS, AND PARKING

In order to mitigate the traffic and access impacts created by the Proposed Project, the Project Applicant will collaborate with LADOT, LAPD, California Department of Transportation, and California Highway Patrol on implementation of a traffic management plan. The following are mitigation measures that shall be implemented in order to reduce potentially significant impacts to less than significant levels:

- 1. To facilitate movement of vehicles, the LAPD and LADOT staff shall have the authority to implement turn restrictions, parking prohibitions, lane closures, barriers/cones, and flexible signage. There shall be a temporary command post available on the site to control and monitor traffic conditions. The area shall be split up into zones, with an engineer assigned to each zone. These engineers would have the authority to react to situations and change restrictions if necessary.

Implementation Phase: Operation
Monitoring Phase: Operation
Enforcement Agency: Coliseum Commission, LADOT, LAPD

- Electronic ticketing shall replace parking guards at problem area lots and traffic signs on adjacent Coliseum streets to minimize parking lot back-up. In addition, season and regular ticket holders could be issued speed passes and assigned parking at specific lots.

Implementation Phase: Operation
Monitoring Phase: Operation
Enforcement Agency: Coliseum Commission

- Real time radio alerts and broadcasts via Highway Advisory Radio (HAR) shall be located where LADOT deems appropriate.

Implementation Phase: Operation
Monitoring Phase: Operation
Enforcement Agency: Coliseum Commission, LADOT

- In conjunction with the aforementioned measures, Changeable Message Signs (CMS) shall be used to direct vehicles from the freeways and surface streets to the Coliseum/USC parking lots. At least eight or more signs would be needed for results to be noticeable and coordinated.

Implementation Phase: Operation
Monitoring Phase: Operation
Enforcement Agency: Coliseum Commission, LADOT

- Project implementation shall include the development of a carpool incentive system to reduce the number of overall vehicle trips.

Implementation Phase: Operation
Monitoring Phase: Operation
Enforcement Agency: Coliseum Commission, LADOT

- Alternate parking sites located away from the Coliseum shall be made available, as well as transportation to and from these parking areas and the Coliseum.

Implementation Phase: Operation
Monitoring Phase: Operation
Enforcement Agency: Coliseum Commission, LADOT

7. Existing turn prohibitions, as illustrated in Figure V.I.1-13 of the Draft EIR, shall remain in place on game days.

Implementation Phase:

Operation

Monitoring Phase:

Operation

Enforcement Agency:

Coliseum Commission, LADOT