



ATTACHMENT NO. 15

ATTACHMENT C MITIGATION MONITORING PROGRAM

The following environmental mitigation measures shall be incorporated into the project development as conditions of approval. The project applicant shall secure a signed verification for each of the mitigation measures which indicate that mitigation measures have been complied with and implemented, and fulfills the City environmental and other requirements (Public Resources Code Section 21081.6.). Final clearance shall require all applicable verification as included in the following table. The City of Culver City will have primary responsibility for monitoring and reporting the implementation of the mitigation measures. The mitigation measures have been identified by impact category and numbered for ease of reference.

MITIGATION MONITORING PROGRAM P2017-0021 – AM, -AUP, -SPR, -GPMA, –ZCMA; and – MND 9735 Washington Boulevard “Brick and Machine”				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>BIOLOGICAL RESOURCES</u>				
BIO-1: The applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either: (1) Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed; or (2) If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then: (a) A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet of construction site boundaries. This	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits	Culver City Planning

MITIGATION MONITORING PROGRAM P2017-0021 – AM, -AUP, -SPR, -GPMA, -ZCMA; and – MND 9735 Washington Boulevard “Brick and Machine”				
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<p>two-tiered survey method is intended to provide the project applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary.</p> <p>(b) If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the project area.</p> <p>Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the</p>				

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Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds				
<u>CULTURAL RESOURCES</u> CULT-1: Prior to issuance of demolition permit, the applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the Qualified Archaeologist and Gabrielino Tribe and shall focus on how to identify archaeological and cultural resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. CULT-2: Prior to issuance of demolition permit, the applicant shall retain a Native American tribal monitor from a Gabrielino Tribe who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

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<p>archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrieleno Tribe.</p> <p>CULT-3: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and the Gabrieleno Tribe. If the resources are Native American in origin, the Gabrieleno Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrieleno Tribe’s treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The</p>				

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<p>treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area for educational purposes.</p> <p>CULT-4: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.</p> <p>CULT-5: A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary sediments. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of</p>				

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<p>excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.</p> <p>CULT-6: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.</p> <p>CULT-7: The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the project applicant to the City and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.</p> <p>CULT-8: If human remains are encountered unexpectedly during implementation of the</p>				

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<p>project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.</p> <p>Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human</p>				

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remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.				
<u>Geology and Soils</u> GEO-1: Site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation shall be implemented per the project’s Final Geotechnical Engineering Investigation, subject to review and approval by the Culver City Building Safety Division.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading and Building Permits and a Foundation Plan	Culver City Building Safety Division and Building Safety Inspector
<u>Hazards and Hazardous Materials</u> HAZ-1: Prior to the issuance of any permit for the demolition or alteration of the existing on-site building, a comprehensive ACMs survey of the buildings shall be performed. If no ACMs are found, the project applicant shall provide a letter to the Culver City Building Safety Division from a qualified asbestos abatement consultant indicating that no ACMs are present in the on-site buildings. If ACMs are found to be present, an operations and maintenance (O&M) program shall be implemented to safely manage the suspect ACMS located at the project site. Further, ACMs found to be present shall be abated in compliance with the South Coast Air Quality Management District’s Rule 1403 as well as all other applicable State and Federal rules and regulations. HAZ-2: Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a comprehensive LBP materials survey shall be performed to the written satisfaction of the Culver City Building Safety Division. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division; Building Safety Inspector; Fire Prevention; Fire Inspector; Planning Division
<u>Hydrology and Water Quality</u> WQ-1: If dewatering activities occur on-site during future redevelopment, samples shall be obtained from the water and analyzed for volatile organic compounds (VOCs) and oxygenates to ensure that they do not exceed applicable discharge requirements. Should the samples exceed VOC, oxygenates or any other applicable	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	On-Going During Construction	Culver City Planning, Public Works, and Building Safety Division

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<p>discharge requirement, a dewatering plan shall be prepared by the project applicant for submittal to the Los Angeles Regional Water Quality Control Board (LARWQCB) and other appropriate agencies determined appropriate in consultation with the LARWQCB for review and approval. The plan shall include but not be limited to sampling of groundwater that may be contaminated; and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from the LARWQCB of approval of a dewatering plan completion shall be submitted to the Culver City Planning Division and Department of Public Works prior to issuance of grading permit.</p>				
<p>Noise</p> <p>NOISE-1: Noise-generating equipment operated at the project site shall be equipped with the most effective noise control devices, <u>(i.e., mufflers, lagging, and/or motor enclosures)</u> <u>achieving a minimum 10 dB reduction in equipment noise.</u> All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. <u>The Chief Building Official, or designated representative, shall conduct periodic site visits to ensure compliance with the requirements set forth in this measure.</u></p> <p>NOISE-2: The project applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison’s telephone number(s) shall be prominently displayed at the project site. Signs shall also be posted at the project site that includes permitted construction days and hours.</p> <p>NOISE-3: Construction and demolition activities shall be scheduled so as to avoid operating <u>more than one piece</u> several pieces <u>of motorized equipment simultaneously within 15 feet of the adjacent sensitive receptors.</u> <u>Should one piece of motorized equipment be operational within 15 feet of an adjacent sensitive receptor, all other motorized equipment must be operated at a minimum of 120 feet from that receptor.</u> <u>The Chief Building Official, or designated</u></p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Building Permit and On-Going during Construction	Culver City Building Safety Division; Building Safety Inspector; Planning Division

MITIGATION MONITORING PROGRAM P2017-0021 – AM, -AUP, -SPR, -GPMA, -ZCMA; and – MND 9735 Washington Boulevard “Brick and Machine”				
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<p><u>representative, shall conduct periodic site visits to ensure compliance with the requirements set forth in this measure.</u></p> <p>NOISE-4: Temporary noise barriers that provide a minimum of 20 dB noise reduction shall be used to block the line-of-site between construction equipment and noise-sensitive receptors (residences) during project construction. Noise barriers shall be a minimum of 20-feet tall along the north boundary adjacent to residential uses.</p> <p>NOISE-5: Contractors shall would phase in construction activity, use low-impact construction technologies, and avoid the use of heavy vibrating equipment where possible to reduce or avoid construction vibration impacts. <u>A large bulldozer shall not be used closer than 20 feet of the Project Site boundary. In the event that a bulldozer is needed within 20 feet of the Project Site boundary, a small bulldozer shall be used. Especially, contractors shall use smaller and lower impact construction technologies to avoid human annoyance to the adjacent buildings. Contractors shall avoid the use of driving piles and drill piles instead where necessary to avoid structural damage.</u></p> <p><u>In order to ensure that construction vibration levels do not exceed applicable thresholds, the contractor shall install and maintain at least two continuously operational automated vibrational monitors with one on the adjacent hospital building and one on the adjacent residential building. The monitoring system must produce real-time specific alarms (via text message and/or email to on-site personnel) when velocities exceed predetermined levels. In the event of an alarm, feasible steps must be taken to reduce vibratory levels, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the regulatory level, work in the vicinity shall be halted and the adjacent hospital and residential buildings inspected for damage. In the event damage occurs to due to construction vibration, repairs shall be arranged. The construction contractor shall be responsible for implementing this measure during the construction phase. The Chief Building Official, or designated representative, shall conduct periodic</u></p>				

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<u>site visits to ensure compliance with the requirements set forth in this measure. Vibration monitoring data shall be collected by the contractor and reported to the City Chief Building Office on a weekly basis.</u>				
<p><u>Public Services</u></p> <p>PS-1: Construction Traffic Management Plan – A Final Construction Traffic Management Plan shall be developed by the project contractor in consultation with the project’s traffic and/or civil engineer and approved by Culver City’s Building Official, Engineer and/or Planning Manager, as applicable, prior to issuance of any project demolition, grading or excavation permit. The Final Construction Traffic Management Plan shall also be reviewed and approved by Culver City’s Fire and Police Department. The Culver City’s Building Official, Engineer and/or Planning Manager, as applicable reserve the right to reject any engineer at any time and to require that the Plan be prepared by a different engineer.</p> <p>Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (“Inspectors”) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other surrounding developments that would potentially be under construction at around the same time as the project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another.</p> <p>The Final Construction Traffic Management Plan shall identify, at a minimum, the following to the satisfaction of the City:</p> <ul style="list-style-type: none"> ▪ The name and telephone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations. ▪ An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, 	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits and On-Going during Construction	Culver City Planning, Public Works, Fire and Police Departments

MITIGATION MONITORING PROGRAM P2017-0021 – AM, -AUP, -SPR, -GPMA, –ZCMA; and – MND 9735 Washington Boulevard “Brick and Machine”				
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<p>potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.</p> <ul style="list-style-type: none"> ▪ Procedures for the training and certification of the flag persons. ▪ The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas. ▪ The location and travel routes of off-site staging and parking locations. ▪ The location of temporary power, portable toilet and trash and materials storage locations. ▪ The timing and duration of all street and/or lane closures and shall be made available to the City in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of project construction, as determined necessary by the City Department of Public Works or designee determined appropriate by Public Works. ▪ Prior to approval of the Plan, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community: <ol style="list-style-type: none"> 1) Construction schedule and hours. 				

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2) Framework for construction phases. 3) Identify traffic diversion plan by phase and activity. 4) Potential location of construction parking and office trailers. 5) Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). 6) Emergency access plan. 7) Demolition plan. 8) Staging plan for the concrete pours, material loading and removal. 9) Crane location(s). 10) Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers)				