

## CHAPTER 5: MITIGATION MONITORING AND REPORTING PLAN

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Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines require adoption of a Mitigation Monitoring or Reporting Program (MMRP) for all projects for which an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) has been prepared. This requirement was originally mandated by Assembly Bill (AB) 3180 which was enacted on January 1, 1989 to ensure the implementation of all mitigation measures adopted through the California Environmental Quality Act (CEQA) process. Specifically, Section 21081.6 of the Public Resources Code states that "...the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment...[and that the program]...shall be designed to ensure compliance during project implementation."

AB 3180 provided general guidelines for implementing monitoring and reporting programs, which are enumerated in more detail in Section 15097 of the CEQA Guidelines. Specific reporting and/or monitoring requirements to be enforced during project implementation are defined prior to final approval of the project. The proposed monitoring and reporting program will be considered by the City of Los Angeles (the lead agency) prior to certification of the EIR. Although the lead agency may delegate reporting or monitoring responsibilities to other agencies or entities, it "...remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

The Mitigation Monitoring and Reporting Program describes the procedures for the implementation of the mitigation measures to be adopted for the proposed project as identified in the Draft and Final EIR. The MMRP for the proposed project will be in place through all phases of the project, including design (pre-construction), construction, and operation (post-construction both prior to and post-occupancy). The City is responsible for administering the MMRP activities or delegating them to staff, other City departments (e.g., Department of Building and Safety, Department of Public Works, etc.), consultants, or contractors. The City will also ensure that monitoring is documented through reports (as required) and that deficiencies are promptly corrected. The designated environmental monitor (e.g. City building inspector, project contractor, certified professionals, etc., depending on the provision specified below) will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems.

Each mitigation measure is categorized by impact area and corresponding number, with an accompanying identification of:

- The enforcement agency and monitoring agency;

- The monitoring phase (i.e., the phase of the project during which the measure should be monitored) and monitoring frequency; and
- The action indicating compliance with the mitigation measure.

### MITIGATION MONITORING AND REPORTING PLAN

| Measure   | Enforcement Agency/Monitor             | Monitoring Phase/Monitoring Frequency                                  | Compliance Action                 |
|---|--|--|-----------------------------------|
| <b>Aesthetics</b>   |  |  |                                   |
| <p><b>Measure 3A.1: Archival photographic documentation.</b> Prior to any demolition, fence enclosure or board-up, Occidental College should prepare full building archival photo documentation similar to HABS Level II guidelines with minimum 2-1/4" negative and 8 x 10 archivally processed black and white prints. The photography should be extensive including overall views, exterior façade, interior and details. The documentation will also include outline narrative information about the building and copies of original drawings. Two original hardcopies and electronic versions on media such as CD shall be prepared. One hardcopy and electronic file shall be deposited with the Los Angeles Public Library and the other should be retained by Occidental College.</p> | DCP/Monitoring Consultant <sup>1</sup> | Prior to submission of building plans.                                 | Project Permit Compliance Review. |
| <p><b>Measure 3A.2: As-built Documentation.</b> The project implementation team for Occidental College shall provide extensive documentation of the existing building for rehabilitation and replication. Field measurements including detailed drawings of openings and decorative elements will be necessary for reconstruction of historic elements. These dimensions and drawings should be part of the documents used for bidding and construction. Use of laser imaging or other technique may support the effort although final documentation should be in a format that is typically used for bidding and construction.</p>   | DCP/Monitoring Consultant              | Prior to submission of building plans.                                 | Project Permit Compliance Review. |
| <p><b>Measure 3A.3: Inventory Procedures.</b> The project implementation team for Occidental College shall provide Construction Documents that include specifications for documentation and inventory procedures to record condition and location of each item that is removed and to be re-installed. Contractor should photo document and inventory all items. A secure and appropriately protected area is to be designated by the Contractor in cooperation with the College for storage of items for re-use.</p>   | DCP/Monitoring Consultant              | Prior to submission of building plans.                                 | Project Permit Compliance Review. |
| <p><b>Measure 3A.4: Design and Construction Monitoring.</b> Occidental College shall engage a qualified historic preservation consultant reviewer/monitor with at least 5 years practical experience in evaluation and application of historic preservation construction techniques in projects of similar size</p>   | DCP/Monitoring Consultant              | Prior to submission of building plans and ongoing during construction. | Project Permit Compliance Review. |

<sup>1</sup> DCP = Los Angeles Department of City Planning, DBS = Los Angeles Department of Building and Safety, Monitoring Consultant means a consultant hired by Occidental College to monitor mitigation measures and document compliance. Compliance certification reports documenting compliance with each measure shall be submitted by the Monitoring Consultant or other designated monitor to the Department of City Planning and as applicable DBS within a timely manner of monitoring activity to ensure that the Planning Department (and Building and Safety) remains informed as to monitoring and compliance activities.

| Measure   | Enforcement Agency/Monitor    | Monitoring Phase/Monitoring Frequency                                  | Compliance Action                 |
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| <p>and scope, the monitor shall also meet the National Park Service standards for qualified preservation architect with at least 10 years experience in design review and collaboration for application of the Secretary's Standards and Guidelines. During the remaining design, documentation and plan review phases, the reviewer/monitor should review the proposed design, and make suggestions as to where preservation elements can be more fully integrated according to the Standards, particularly for the design issues and features outlined in this evaluation. Furthermore, the reviewer/monitor shall review and comment on treatments for rehabilitation, reconstruction and new construction and shall comment upon whether the design, documentation and construction is implemented in accordance with the mitigation measures contained in the Draft EIR and with accepted professional preservation practice. Prior to approval of final construction plans, the reviewer/monitor shall submit a report to Occidental College and the City Planning Department summarizing critical historic preservation issues and addressing unforeseen circumstances. The reviewer/monitor shall also outline the role he/she will play during construction. Occidental College shall complete construction in a manner consistent with the historical preservation report as adapted and final construction plans. The reviewer/monitor will periodically monitor construction for consistency with the historic preservation report and final construction plans, and will participate in regular and special pre-construction meetings as well as regular construction meetings with the project implementation team.</p> |                               |  |                                   |
| <p><b>Measure 3A.5: Archaeological Resources.</b> If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or human bone, are inadvertently discovered during ground-disturbing activities, work shall cease in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with Occidental College, the City, and other appropriate agencies.</p> <p>If any archaeological materials are encountered during the course of the project development, the project shall be halted, and the services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report shall be submitted to the South Central Coastal Information Center (SCCIC) at Cal State Fullerton. A covenant and agreement reflecting this measure shall be recorded prior to obtaining a grading permit.</p> <p>Any potentially significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.</p>  | DCP/DBS/Monitoring Consultant | Prior to submission of building plans and ongoing during construction. | Project Permit Compliance Review. |
| <p><b>Measure 3A.6: Human Remains.</b> In the event of discovery or recognition of any human remains on the site, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of Los Angeles County has been contacted, per Section 7050.5 of the California Health and Safety Code. If the coroner determines that the human remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage</p>   | DCP/DBS/Monitoring Consultant | Prior to submission of building plans and ongoing during construction. | Project Permit Compliance Review. |

| Measure  | Enforcement Agency/Monitor    | Monitoring Phase/Monitoring Frequency                                  | Compliance Action                 |
|--|-------------------------------|--|-----------------------------------|
| <p>Commission (Public Resources Code Section 5097). If any human remains are discovered or recognized in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until</p> <ol style="list-style-type: none"> <li>a. The coroner of the County has been informed and has determined that no investigation of the cause of death is required; and</li> <li>b. If the remains are of Native American origin, <ol style="list-style-type: none"> <li>1. The descendants of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or</li> <li>2. The Native American Heritage Commission was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the commission.</li> </ol> </li> </ol> |                               |  |                                   |
| <p><b>Measure 3A.7: Paleontological Resources.</b> If any paleontological materials are encountered during the course of the project development, the project shall be halted, and the services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. A covenant and agreement reflecting this measure shall be recorded prior to obtaining a grading permit.</p>   | DCP/DBS/Monitoring Consultant | Prior to submission of building plans and ongoing during construction. | Project Permit Compliance Review. |