

EXPOSITION PARK MASTER PLAN

MITIGATION AND MONITORING REPORTING PROGRAM

STATE CLEARINGHOUSE NUMBER: 1990011065

PREPARED FOR:

OFFICE OF EXPOSITION PARK MANAGEMENT
700 EXPOSITION PARK DRIVE
LOS ANGELES, CA 90037

PREPARED BY:

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1. INTRODUCTION

The Office of Exposition Park Management (OEPM) 25-year Exposition Park Master Plan (refined project) is intended to guide the development of Exposition Park and link it to the surrounding City of Los Angeles by connecting the park's segments to one another and encouraging the community members and visitors to linger with the inclusion of more plentiful pathways, plantings, and visitor amenities.

Section 21081.6 of the Public Resources Code, enacted by passage of Assembly Bill 3180 (Cortese Bill) and described in Section 15097 of the State CEQA Guidelines, requires public agencies approving projects with significant environmental impacts to adopt a monitoring and reporting program. The objective of the program is to ensure that mitigation measures adopted to avoid or mitigate significant environmental impacts are implemented. Section 21081.6 of the Public Resources Code requires all state and local agencies to establish monitoring and reporting programs whenever approval of a project relies upon an Environmental Impact Report (EIR). Section 15091(a) of the State CEQA Guidelines requires a public agency to make written findings for significant effects that (1) changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR, (2) such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding, and/or (3) specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. In accordance with these requirements, this Mitigation Monitoring and Reporting Program (MMRP) has been prepared to ensure that mitigation measures identified in the 2003 Los Angeles Memorial Coliseum Renovation Project EIR, as amended by four addenda to the EIR,^{1,2,3,4,5} and as detailed in the Subsequent EIR to the Los Angeles Memorial Coliseum Renovation Project EIR (State Clearinghouse No. 1990011065), are implemented in an effective and timely manner, and that identified impacts are avoided or mitigated to a level of insignificance. The MMRP identifies responsible parties for the mitigation program and includes a detailed discussion of monitoring and reporting procedures for each mitigation measure.

The 2003 Los Angeles Memorial Coliseum Renovation Project EIR required implementation of 54 mitigation measures in relation to Air Quality (Greenhouse Gas Emissions), Cultural Resources, Geology & Soils, Noise, Public Services (security), Transportation, and Utilities & Service Systems (including Energy; Table 1-1, *Summary of 2003 Los Angeles Memorial Coliseum Renovation Project EIR Mitigation Measures*).⁶ These mitigation measures would continue to apply to the refined project.

¹ Los Angeles Memorial Coliseum Commission. September 5, 2003. Los Angeles Memorial Coliseum Renovation Project Environmental Impact Report. Prepared by Christopher A. Joseph & Associates.

² Los Angeles Memorial Coliseum Commission. May 1, 2006. Addendum to the Los Angeles Memorial Coliseum Renovation Project EIR (SCH# 1990011065). Prepared by Christopher A. Joseph & Associates.

³ Los Angeles Memorial Coliseum Commission. April 2016. Addendum to the Environmental Impact Report for the Los Angeles Memorial Coliseum Renovation Project: State Clearinghouse No. 1990011065. Prepared by Eyestone Environmental.

⁴ Los Angeles Memorial Coliseum Commission. December 2016. Third Addendum to the Los Angeles Memorial Coliseum Renovation Project EIR. Prepared by Eyestone Environmental.

⁵ City of Los Angeles Department of City Planning. April 2017. Fourth Addendum to the Environmental Impact Report for the Los Angeles Memorial Coliseum Renovation Project: State Clearinghouse No. 1990011065. Prepared by Eyestone Environmental.

⁶ Los Angeles Memorial Coliseum Commission. September 5, 2003. Los Angeles Memorial Coliseum Renovation Project Environmental Impact Report. Prepared by Christopher A. Joseph & Associates.

**TABLE 1-1
SUMMARY OF 2003 LOS ANGELES MEMORIAL COLISEUM
RENOVATION PROJECT EIR MITIGATION MEASURES**

Environmental Issue Area	Summary of Mitigation Measures
Air Quality / Greenhouse Gas Emissions	<ol style="list-style-type: none"> 1. Haul trucks staged on-site 2. Diesel-powered equipment located away from sensitive land uses 3. Restricted grading activities on exceedingly windy days (fugitive dust emissions) 4. Ground wetting in accordance with SCAQMD Rule 402 for dust control 5. Cover stockpiles of soil, sand and similar materials 6. Equipment engine maintenance 7. Construction equipment shut off to reduce idling 8. Discontinue construction activities during second-stage smog alerts 9. Traffic management measures 10. Comply with South Coast Air Quality Management District's Regulation 15
Cultural Resources	<ol style="list-style-type: none"> 1. Historic American Building Survey (HABS) standards recordation 2. Standard 7 of <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i> 3. Conceptual Historic Fabric Retention Plan
Geology & Soils	<ol style="list-style-type: none"> 1. Uniform Building Code for Seismic Zone 4 2. Comprehensive Geotechnical Investigation 3. Geotechnical Report Recommendations Compliance 4. Foundation Report/Supplements and Approval Letter 5. Supervised Grading and Foundation Plan Review 6. Artificial Fill Compliance with State and/or City Grading Codes 7. Fill and Subdrain Placement Area Inspections 8. Haul Route Approval by City of Los Angeles 9. Hazardous Materials Disposal 10. Landfills as last resort disposal option 11. Groundwater Remediation 12. Perched Groundwater or Saturated Soils Removal
Noise	<ol style="list-style-type: none"> 1. Compliance with LAMC City Noise Ordinance 2. Construction-Related Traffic Plan 3. Regular Notification of Major Construction Activities and Durations 4. Muffle and Shield Construction Equipment 5. Temporary Construction Barrier Wall
Public Services (security)	<ol style="list-style-type: none"> 1. Plot Plan Review by LAPD 2. Building Plan Filing with LAPD Southwest Area Commanding Officer 3. Construction Site Security Features 4. Landscaping Standards 5. Security Lighting 6. Pedestrian Safety Features 7. Security Plan with LAPD and LADOT 8. Emergency Procedures Plan with LAPD and LADOT 9. Traffic Control Personnel
Transportation	<ol style="list-style-type: none"> 1. LAPD and LADOT Authority 2. Electronic Ticketing and Speed Passes 3. Real Time Radio Alerts and Broadcasts 4. Changeable Message Signs 5. Carpool Incentive System 6. Alternative Parking Sites 7. Existing Turn Prohibitions

**TABLE 1-1
SUMMARY OF 2003 LOS ANGELES MEMORIAL COLISEUM
RENOVATION PROJECT EIR MITIGATION MEASURES**

Environmental Issue Area	Summary of Mitigation Measures
Utilities & Service Systems / Energy	<p><i>Energy Conservation</i></p> <ol style="list-style-type: none"> 1. Design Consultation with LADWP and Title XXIV Efficiency Standards <p><i>Water Conservation</i></p> <ol style="list-style-type: none"> 1. LAFD Fire Flow Requirements 2. City of Los Angeles Water Conservation Program Measures 3. Automatic Sprinkler System Timing 4. Reclaimed Water Use 5. On-Site Recycling of Drainage 6. Recirculating Hot Water Systems 7. Efficient Plumbing Fixtures

2. PROJECT DESCRIPTION

The refined project is intended to guide the development of Exposition Park during a 25-year period to link Exposition Park to the surrounding City of Los Angeles by connecting the park’s segments to one another and encouraging the community members and visitors to linger with the inclusion of more plentiful pathways, plantings, and visitor amenities. The refined project will connect the park’s segments by improving pedestrian and recreational use of the spaces between its buildings and relocating surface parking spaces to a below-grade parking structure. The 25-year master plan is composed of nine elements:

1. Threshold and Gateway
2. Expo Festival Plaza
3. Solar Garden
4. Festival Park and Community Promenade
5. Bill Robertson Lane
6. Museum Walk
7. California African American Museum Sculpture Garden
8. Zanja Madre
9. Olympic Ring Walk

The refined project will connect the park’s segments by improving pedestrian and recreational use of the spaces between its buildings and moving surface parking spaces underground.

The refined project will retain the Exposition Park Rose Garden, Ahmanson Senior Center (formerly Exposition Club House), the Wallis Annenberg Building (formerly the State Armory Building), Los Angeles Swimming Stadium, and the Los Angeles Memorial Coliseum interior and surrounding berm. In essence, the refined project will provide and enhance connectivity and unity in two ways: (1) linkage between the park’s segments and (2) linkage between the park and the surrounding community. The design for the project elements is subject to refinement and only serves as a conceptual guide for the long-term development of Exposition Park. It does not include detailed design of any proposed facilities.

2.1 Construction Scenario

The SEIR evaluated the construction that would be required to build out the refined project area in the general configurations of the Master Plan. The elements of the refined project are conceptual and will require additional survey, design, and engineering work to support design development and ultimately project construction, operation, and maintenance. The design for the project elements is subject to refinement.

Exposition Park will remain open during the construction of individual project elements, with portions of the property closed off with fencing surrounding the construction activity areas. The buildings and structures described in the Master Plan will be constructed within existing Master Plan Area boundaries. The refined project includes the demolition of the surface parking lot and the construction of a subterranean parking structure in its place as well as street and pedestrian improvements.

Site preparation and construction for the proposed individual projects identified within the refined project shall be undertaken in accordance with all federal, state, and local applicable building codes. Daily construction activities shall be undertaken Monday through Friday, between 7:00 a.m. and 9:00 p.m. and on Saturdays between 8:00 a.m. to 6:00 p.m. No work shall be conducted on Sundays or any recognized federal, state, or local holidays. Exposition Park is not required to comply with the City of Los Angeles General Plan and Noise Ordinance. As per the California State Park System,⁷ engine driven electric generators which can disturb others, may be operated only between the hours of 10:00 a.m. and 8:00 p.m. Loud disturbing noise is prohibited at all times and is prohibited between 10:00 p.m. and 6:00 a.m. Construction equipment shall be turned off when not in use. All heavy equipment shall be mobilized at night and shall have no conflicts with circulation. The construction contractor shall ensure that all construction and grading equipment is properly maintained. All vehicles and compressors shall utilize exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times. All stockpiles shall be covered at all times when not in use.

The environmental analysis for the refined project is based on a potential worst-case scenario for construction activities, including improvements to pedestrian and bike paths, enhancements to vehicular access, and parking availability. While phasing of the individual projects proposed in the refined project has not yet been determined, the analysis assumes that construction activities will be completed with an overall 25-year time frame, with phasing determined based on individual projects. The construction scenario for the impact analysis assumes that construction activities for each element will occur concurrently and the direct impact area for each individual element was modeled accordingly based on a tentative construction schedule (Table 2.1-1, *Construction Schedule for Project Elements*).

⁷ State of California Department of Parks and Recreation. 2019. <https://www.parks.ca.gov/>

**TABLE 2.1-1
CONSTRUCTION SCHEDULE FOR PROJECT ELEMENTS**

Project Element Number	Project Element Name	Estimated Duration (months)	Square Feet per Element	Construction Square Feet per Element	Improvements Description
1	Threshold and Gateway	13	80,100	80,100	Improvements to pedestrian and cyclist entrance; New protected cycle track; New Canopy street trees, planting buffers, widening of sidewalks, and pick-up/drop-off
2	Expo Festival Plaza	8	227, 826	227,826	Enhanced gathering space
3	Solar Garden	16	173, 967	173,967	Installing solar panel poles on existing parking structure with electrical connections
4	Festival Park and Community Promenade	61	619,819	619,819	Landscaping along pedestrian circulation paths, recreational features, an expansive lawn area; Demolish surface parking lot; Construction of subterranean parking structure; Construction of Festival Park and Community Promenade; Recreational Areas consisting of playground; Bus Parking lot at street surface level
5	Bill Robertson Lane	54	123,787	123,787	Dedicated loading zones; Improvements to accommodate existing bus drop off/pick up lane; Street improvements along Bill Robertson Lane; Canopy trees in vegetated planters along the street
6	Museum Walk	49	98,171	98,171	Enhanced pedestrian circulation; Canopy Shade trees with seating zones; Street paving
7	California African American Museum Sculpture Garden	14	44,048	44,048	Plaza, dining area, garden and enhanced entry; Sculpture garden; Fire access road for promenade
8	Zanja Madre	35	203,132	203,132	Central plaza-like gathering space; Two sunken lawn areas; Improvement to accommodate existing school bus drop off/pick up area; Iconic boulder; Victory Walk; Extension of the Museum Walk

**TABLE 2.1-1
CONSTRUCTION SCHEDULE FOR PROJECT ELEMENTS**

Project Element Number	Project Element Name	Estimated Duration (months)	Square Feet per Element	Construction Square Feet per Element	Improvements Description
9	Olympic Ring Walk	37	243,936	243,936	Reconfigured path providing concessions and amenities historic markers embedded in enhanced pedestrian paving, landscaping improvements (trees, palms, and understory planting), lighting, festival banners and stormwater management opportunities
Total Construction Duration					25 years

The refined project will not displace the current drop off/pick up locations along Exposition Park Drive and Bill Robertson Lane. Construction phasing will need to be considered during the design development for Elements of the refined project to allow for continuous and uninterrupted use of drop off/pick up designated areas. For instance, construction for a refined project Element can be phased in order to accommodate the drop off/pick up by temporarily relocating the drop off/pick up area up the street, down the street or across the street for minimal disruption. In addition, a parking plan will need to be prepared and produced, during the design development stage, to accommodate temporary parking of group and/or school buses during the construction phase of any refined project Element (see Section 2.2).

Construction

Construction activities associated with the refined project within Element 4, as currently conceived, will entail grading of the existing parking lot and the construction of the two and three-level subterranean parking structure increasing parking capacity at the Exposition Park (Table 2.1-2-, *Parking Structure Construction*).

**TABLE 2.1-2
PARKING STRUCTURE CONSTRUCTION**

Element Number	Existing Surfacing to Be Removed/Graded	Existing Approx. Square Feet ¹	Refined Project Construction Activity	New Approx. Square Feet ²
4	Four surface parking lots (lots 4, 5, 6, and VIP parking)	619,819	Replace with subterranean parking structure at same location and lawn area, pedestrian pathways, playground, plaza with iconic viewing tower, and skate park above structure at surface level	619,819

A list of the type and quantity of construction equipment that will potentially be used in the construction of one element (worst-case scenario) of the refined project was used in assessing the potential of the refined project to result in unanticipated significant construction impacts to air quality (Table 2.1-3, *Anticipated Worst-Case Construction Equipment*).

**TABLE 2.1-3
ANTICIPATED WORST-CASE CONSTRUCTION EQUIPMENT**

Approximate Quantities	Type of Equipment/Vehicle
3	Dump truck
1	Graders or dozers for earthwork
1	Concrete/Industrial Saws
20	Crew vehicles
2	Rubber Tired Dozers
4	Tractors/Loaders/Backhoe
10	Delivery trucks
2	Scrapers
2	Excavators
1	Cranes
3	Forklifts
1	Generator Sets
1	Welders
2	Pavers
2	Paving Equipment
2	Rollers
1	Air Compressors

2.2 Project Design Features and Regulatory Compliance Measures

Project Design Features

Transportation and Street Right-of-Way Safety

OEPM is committed to continued coordination with the City of Los Angeles StreetsLA (previously Bureau of Street Services),⁸ the Los Angeles County Metropolitan Transportation Authority (LA

⁸ City of Los Angeles StreetsLA, Urban Forestry Division. Accessed June 26, 2020. About Us. Available at: <https://streetsla.lacity.org/about>

Metro), and local organizations regrading street trees along parkways where overlap occurs between the refined project area and those jurisdictions. Trees along roadways including public transit stops shall be coordinated and evaluated to meet clearances, setbacks, standards, and maintenance for avoiding visibility conflicts with transit circulation. For instance, tree height and canopy clearances shall be maintained at over 14 feet high to prevent visual and physical impediments for buses, cars, and bicycles. Installation of planting adjacent to roadways including bus stops, in conjunction with the Master Plan, shall also be coordinated to maintain visibility and line of sight for motorists, cyclists, and pedestrians to avoid conflicts between motorized vehicles, cyclists, and pedestrians.

The refined project has been designed to be consistent with all of the recommendations under the *Metro Adjacent Development Handbook*, including the four applicable guidelines:⁹

- 1.1 – Supporting Transit-Oriented Communities
- 1.6 – Enhancing Access to Transit
- 1.9 – Driveways / Access Management
- 1.10 – Bus Stops and Zones Design

OEPM participated in the May 15, 2020, Joint Design Workshop during development of the Master Plan and is committed to continuing to work with LA Metro and LADOT in the future to design all features to mutually benefit Exposition Park, transit, and other infrastructure. As the refined project does not include detailed design, the cycle track design (Element 1) will be subject to additional review by affected stakeholders, including LA Metro and LADOT, to ensure that the design of the cycle tracks and other refined project elements do not conflict with public transit or other nearby infrastructure, including the overhead catenary system (OCS) high-voltage lines powering the Metro E Line, OCS support structures, and the Metro E Line ticket vending machines, map cases, and shade canopy adjacent to Jesse Brewer Jr. Park. All refined project features that could affect LA Metro facilities or operations will be designed in consultation with LA Metro to ensure that all access criteria are met throughout construction and operation or Master Plan improvements approved by the Board of Directors for Exposition Park and the CSC.

As it pertains to the refined project, OEPM is committed to continuing this dialogue through final design and implementation of those Master Plan improvements approved by the Board of Directors for Exposition Park and the CSC.

Construction Parking

A parking plan shall be prepared and produced by the contractor, during the design development stage, to accommodate temporary parking of group and/or school buses during the construction phase of any refined project Element.

Operational Plan – Buses

A detailed operational plan to manage the overall flow of buses shall be produced by OEPM in conjunction with the museum and educational institutions in anticipation of the new LMNA museum opening.

⁹ Los Angeles County Metropolitan Transportation Authority. January 2020. *Metro Adjacent Development Handbook: A Guide for Cities and Developers*. Available at https://media.metro.net/projects_studies/joint_development/images/mad_handbook.pdf

Regulatory Compliance Measures

The refined project shall be required to comply with applicable regulations, including the ADA, the California Building Standards Code (California Code of Regulations [CCR] Title 24), regulations and requirements of the California Public Utilities Commission (CPUC), California Occupational Safety and Health Administration (Cal/OSHA) regulations (CCR, Title 8), and permit requirements, such as Building & Safety permits for projects within 100 feet of LA Metro right-of-way (ROW).¹⁰

Storm Water Pollution Plan BMPs

Best management practices (BMPs) shall be utilized through the duration of the construction per the Storm Water Pollution Prevention Plan (SWPPP) as required by the Construction General Permit (Table 2.2-1, *Best Management Practices*).

**TABLE 2.2-1
BEST MANAGEMENT PRACTICES**

Erosion Controls
<p>Scheduling (EC-1)</p> <ul style="list-style-type: none"> All BMPs shall be in place year-round. Construction activities shall be planned and performed to minimize the area and duration of exposure of soil to erosion by wind, rain, runoff and vehicle tracking. The area that can be cleared or graded and left exposed at one time shall be limited to the amount of acreage that the Contractor can adequately protect prior to a predicted rainstorm. A predicted storm event is defined as a forecasted 50% chance of rain. Timing of construction shall be considered when scheduling work to minimize soil disturbing activities and major grading operations during the rainy season. Grading of the site shall be phased to minimize the total area of exposed soil and the duration of exposure.
<p>Preserve Existing Vegetation (EC-2)</p> <ul style="list-style-type: none"> Existing vegetation shall be retained (EC-2) in undisturbed areas to the extent possible. If possible, vegetative buffer strips shall be left adjacent to watercourses and along the site perimeter.
<p>Temporary Soil Stabilization (EC-3), (EC-4), (EC-7)</p> <ul style="list-style-type: none"> Erosion Control Blankets (EC-7), hydraulic mulches (EC-3) with seed (EC-4), and/or temporary vegetation shall be used on disturbed soil areas as a temporary surface cover until soils can be prepared for re-vegetation and permanent vegetation is established. At a minimum, disturbed areas shall remain bare and unworked for over two weeks. Any hydraulic soil stabilizers applied shall include mulch, so that any potential pollutant transport to the storm drain system is visually detectable.
<p>Soil Roughening (EC-15)</p> <ul style="list-style-type: none"> Soil shall be roughened with the vehicle tracks perpendicular to the direction of flow.
<p>Dust Control (WE-1)</p> <ul style="list-style-type: none"> Wind Erosion Controls (WE-1) shall be provided to prevent or alleviate dust generated by construction activities. Care shall be taken to prevent overwatering, which may result in runoff or erosion.
Sediment Controls
<p>Stabilize Perimeter (SE-1, SE-5, SE-6)</p> <ul style="list-style-type: none"> To prevent transport of sediment off site, the site perimeter shall be stabilized using controls such as silt fence (SE-1), fiber rolls (SE-5), or gravel bag berms (SE-6).

¹⁰ Los Angeles County Metropolitan Transportation Authority. Accessed August 4, 2020. *Metro Development & Construction Coordination*. Available at: <https://www.metro.net/projects/devreview/>

**TABLE 2.2-1
BEST MANAGEMENT PRACTICES**

<p>Fiber Rolls (SE-5)</p> <ul style="list-style-type: none"> Fiber rolls shall be used to reduce flow velocity (as slope interrupters or temporary check dams) and provide some removal of sediment, predominantly along the face or toe of erodible slopes and for perimeter sediment control. Fiber rolls are not appropriate as the only BMP at a site, should be used in conjunction with other erosion and sediment control measures to reduce pollutant discharges, and shall be maintained by the Contractor for effective sediment control.
<p>Gravel bag berms (SE-6)</p> <ul style="list-style-type: none"> Gravel bag berms shall be used to reduce flow velocity (as slope interrupters or temporary check dams) and provide some removal of sediment. Gravel bag barriers shall be used for perimeter site control or along streams or channels or around stockpiles to intercept sediment laden sheet flow or moderately concentrated flows.
<p>Street Sweeping and Vacuuming (SE-7)</p> <ul style="list-style-type: none"> Street sweeping and vacuuming shall be used anywhere dry sediment is tracked from the Master Plan Area onto paved streets and roads, typically at points of egress.
<p>Tracking Controls (TC-1, TC-2)</p> <ul style="list-style-type: none"> A stabilized construction entrance shall be used to reduce offsite tracking (TC-1). Construction roads shall be stabilized to prevent tracking of sediments. (TC-2).
<p>Storm Drain Inlet Protection (SE-10)</p> <ul style="list-style-type: none"> All storm drains in the Master Plan Area and offsite where inlets can receive flow downstream of sediment tracked from the site shall be protected with appropriate storm drain inlet protection such as filter fabrics, block and gravel filters, gravel and wire mesh filters, or gravel bag barriers.

Biological Resources – Protected Trees

In accordance with Section 46.02 of the Los Angeles Municipal Code, “no person shall relocate or remove any oak tree, as that term is defined in Section 46.01, where said oak tree is located on a lot larger than one acre in size and is not regulated pursuant to Article 7 of Chapter I of this Code, without first having applied for and obtained a permit from the Board of Public Works or its designated officer or employee, except as otherwise provided herein. Removed Oak trees shall be replaced at a minimum of a 2:1 ratio. The size and number of the replacement trees shall approximately equal that of the original removed trees.”

Heritage trees, Special Habitat Value trees, Common Park trees, and Trees Protected by Los Angeles City Ordinances are all afforded certain protections to protect their value to the surrounding ecosystem. Consultation with City of Los Angeles Department of Recreation and Parks (DRP) is required prior to any activities that could cause a protected tree to become damaged, relocated, or removed.

Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Paleontological Resources

Paleontological Resources Sensitivity Training given by a qualified paleontologist or archaeologist cross-trained in paleontology shall be required for all project personnel involved in ground-disturbing activities prior to the start of ground-disturbing activities in geologic units with a moderate to high potential to yield unique paleontological resources. This shall include a brief field training that provides an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified. This requirement extends to any new staff involved in earth disturbing that joins the project.

Construction Noise

During construction activities within a 50-foot radius of sensitive receptors (Elements 1, 3, and 5), sound walls shall be installed by the contractor during the demolition and construction phase for each of the project Elements within Exposition Park along the property boundary facing the existing residents to reduce the noise levels. Mufflers, blankets, and baffles shall also be implemented to ensure the reduction of noise levels. The noise barriers shall provide noise level reductions ranging from approximately 5 dBA to 20 dBA depending of the placement and structure of the sound wall.

Construction – ROW Permits

Consultation with LA Metro is required prior to the issuance of any building permit for projects within 100 feet of LA Metro–owned Rail or BRT ROW. LA Metro must review applicable projects to ensure safe access to, and operations of, transportation services and facilities. Projects within 100 feet of an LA Metro Rail or BRT ROW, such as Element 1, require LA Metro clearance to include demolition, excavation, new structures, improvements or additions to existing structures, seismic retrofitting, tunneling/boring, construction or maintenance that requires use of cranes, truck delivery of concrete and other materials, and freestanding sign structures.

The Project Sponsor shall submit civil engineering and landscaping drawings and calculations, as well as construction work plans and methods for any utility work in the public right-of-way and any crane placement and radius, to evaluate any impacts to the Metro E Line (Expo) infrastructure in relationship to the project. Before the start of any construction activities, the Project Sponsor shall obtain LA Metro’s approval of final construction plans.

The construction and operation of the project shall not disrupt the operation and maintenance activities of the Metro E Line (Expo) or the structural and systems integrity of LA Metro’s light rail infrastructure. Not later than one month before project construction, the Project Sponsor shall contact LA Metro to schedule a preconstruction meeting with all project construction personnel and LA Metro Real Estate, Construction Management, and Construction Safety staff. During project construction, the Project Sponsor shall

1. Work in close coordination with LA Metro to ensure that Station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions
2. Notify LA Metro of any changes to construction activities that may impact the use of the ROW
3. Permit LA Metro staff to monitor demolition and/or construction activities to ascertain any impact to the E Line (Expo) and Expo/Vermont and Expo/USC Stations.

For any temporary or ongoing access to LA Metro ROW for demolition, construction, and/or maintenance activities, the Project Sponsor shall complete LA Metro's Track Allocation process with LA Metro Rail Operations and obtain a Right of Entry Permit from LA Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Project Sponsor shall apply for and obtain such approval from LA Metro not later than two months before the start of project construction. The Project Sponsor shall apply for and obtain approval from LA Metro for any special operations, including the use of a pile driver or any other equipment that could come into proximity to the OCS or support structures, not later than one month before the start of project construction.

Any temporary or permanent wayfinding signage with content referencing LA Metro services or featuring the LA Metro brand and/or associated graphics (such as LA Metro Bus or Rail pictograms) requires review and approval by LA Metro Signage and Environmental Graphic Design. OEPM shall coordinate with LA Metro regarding any use of LA Metro's name or graphics on Exposition Park wayfinding signage.

Construction – Transportation Facilities Conflicts Review

OEPM shall provide design plans and construction work plans at a pre-construction meeting with LA Metro for any utility work and crane placement in the vicinity of LA Metro facilities to obtain Metro's approval prior to construction. OEPM shall coordinate with LA Metro Bus Operations Control Special Events Coordinator, LA Metro's Stops and Zones Department, and LADOT Transit at not later than 30 days before the start of project construction for Elements 1 and 4 regarding transportation services, stops, and temporary or permanent bus service rerouting.

The Project Sponsor shall take all necessary measures to protect the Metro E Line OCS from damage due to project activities during and after construction, pursuant to applicable California Department of Industrial Relations regulations (CCR, Title 8). The Project Sponsor shall post proper signage for equipment working around the OCS wires. Any landscaping shall be set back at least 10 feet from the OCS wires and support structures.

The Project Sponsor shall coordinate with LA Metro for any proposed relocation or changes to LA Metro's station ticketing and wayfinding equipment to ensure that the function, visibility, and access to the TVMs are not compromised during project construction.

3. RESPONSIBLE PARTY

OEPM shall be responsible for reporting mitigation measures. OEPM or its designee shall be responsible for implementing and reporting mitigation measures in this program. OEPM will have responsibility for ensuring that mitigation measures are accomplished in an environmentally responsible manner and that the status of mitigation measures is reported in accordance with this program. OEPM shall be responsible for ensuring that the cost of mitigation is included in the budget for the planning, construction, operation, and maintenance of each Master Plan element whose approval has been conditioned on implementation of the mitigation measures specified in this MMRP.

The OEPM shall be responsible for program oversight of the implementation of the construction-related mitigation measures. Mitigation measures shall be included in applicable requests for proposals (RFP), specifications and procedures issued for construction of the individual Master Plan elements of this project (Table 2.1-1). Other mitigation measures funded by the Contractor shall be

subject to oversight by OEPM. In addition, the OEPM shall be responsible for ensuring that mitigation measures are properly carried out by designated and qualified personnel, which may include specialty contractors. The OEPM shall be responsible for ensuring that applicable mitigation measures are carried forward in operational and maintenance procedures for the elements of the Master Plan (see Table 3-1, *Summary of Mitigation Measures Applicable to Master Plan Elements*).

**TABLE 3-1
SUMMARY OF MITIGATION MEASURES APPLICABLE TO MASTER PLAN ELEMENTS**

Master Plan Element	Mitigation Measure													
	AESTHETICS-1	AESTHETICS-2	BIO-1	CULTURAL-1	CULTURAL-2	CULTURAL-3	CULTURAL-4	CULTURAL-5	CULTURAL-6	HAZ-1	HAZ-2	PALEO-1	TRIBAL-1	TRIBAL-2
1. Threshold and Gateway	X	X	X		X									
2. Expo Festival Plaza	X	X	X		X	X								
3. Solar Garden					X	X			X					
4. Festival Park & Community Promenade			X	X	X	X	X	X		X	X	X	X	X
5. Bill Robertson Lane		X	X		X				X	X	X			
6. Museum Walk	X	X	X		X	X								
7. CAAM Sculpture & Garden		X	X		X									
8. Zanja Madre		X	X	X	X		X	X				X	X	X
9. Olympic Ring Walk	X	X	X		X	X								

4. MITIGATION REQUIREMENTS, SCHEDULE, AND REPORTING FREQUENCY

Based on the findings of the SEIR, mitigation measures are not required for aesthetics, agriculture/forestry resources, air quality, energy, greenhouse gas emissions, hydrology and water quality, land use and planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities/service systems, wildfire. Specific mitigation measures are required for biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources (see Table 3-1). Potentially significant impacts in these environmental resource areas shall be avoided or minimized with implementation of 14 specific mitigation measures (Table 4-1, *Mitigation Monitoring and Reporting Program for the Exposition Park Master Plan*).

The method for executing the mitigation measure, organization responsible for implementing and funding the measure, estimated completion date for each measure, frequency of reporting, and significance after mitigation has been articulated for each mitigation measure (Table 4-1). Due to possible funding conditions and other external factors, facility construction and operation could be delayed. These delays may also affect the start and completion of mitigation measures.

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE EXPOSITION PARK MASTER PLAN**

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Enforcement Agency	Monitoring Agency	Documentation of Compliance	
					Source	Signature/Date
Aesthetics						
Mitigation Measure AESTHETICS-1: To mitigate potential impacts on aesthetics, including scenic vistas and visual character or quality for the four elements of the refined project that contain historic character—defining features within Exposition Park (Elements 1 [Threshold & Gateway], 2 [Expo Festival Park], 6 [Museum Walk], and 9 [Olympic Ring Walk]), design review by the State Architect (for Elements 1, 2, 6, and 9) and the City of Los Angeles Director of City Planning (for Element 9) ¹¹ shall be required for projects proposed under Elements 1, 2, 6, and 9 for verification of character-defining feature preservation in accordance with the Secretary of the Interior’s <i>Standards for the Treatment of Historic Property: Rehabilitation</i> (36 CFR 67). The design review application shall contain relevant information to characterize the project for consistency with the Secretary of the Interior’s <i>Standards for the Treatment of Historic Properties: Rehabilitation</i> , including a narrative describing how the integrity of the character-defining features will be preserved. The design review application shall demonstrate the manner in which the project maintains a historic viewshed and/or historic visual character.	Office of Exposition Park Management	Pre-Construction	Office of Exposition Park Management	Office of Exposition Park Management	Treatment and Management Plan including a Cultural/Historic Landscape Report, As-Built records and Preservation Maintenance Guide for Cultural Landscapes	(Signature/Date of Monitoring Agency)
Mitigation Measure AESTHETICS-2: The planning, identification, protection, retainment, treatment, and maintenance of cultural landscapes, such as residential gardens and community parks, scenic highways, rural communities, institutional grounds, cemeteries, battlefields and zoological gardens, as it pertains to Preservation and Restoration require a multi-disciplinary approach. Included as part of cultural landscapes are the physical features with cultural or aesthetic values described as having visual and spatial relationships that are character defining which, individually or collectively contribute to the landscape's physical appearance, such as vegetation; topography; water features, such as ponds, streams, and fountains; circulation features, such as roads, paths, steps, and walls; buildings; and furnishings, including fences, benches, lights and sculptural objects. The planning, protection, retainment, treatment and maintenance of any cultural landscape features for the refined project shall be coordination with OEPM, the State Architect, and the City of Los Angeles Director of City Planning and shall be consistent with the Secretary of the Interior’s <i>Standards for the Treatment and Management of Cultural Landscapes: Preservation; Rehabilitation</i> . The following measures should be addressed prior to undertaking work pertaining to cultural landscapes and related historic materials and features: 1. A treatment plan or similar document shall be developed. All features that contribute to the landscape's cultural or historic character (spatial organization and land patterns, topography, vegetation, circulation, water features, or structures, furnishings, and	Office of Exposition Park Management	Pre-Construction	Office of Exposition Park Management	Office of Exposition Park Management	Treatment and Management Plan including a Cultural/Historic Landscape Report, As-Built records and Preservation Maintenance Guide for Cultural Landscapes	(Signature/Date of Monitoring Agency)

¹¹ The Coliseum District Specific Plan establishes that the Coliseum Renovation Project shall be developed under the Specific Plan so that the Coliseum retains its National Historic Landmark Designation, as determined to the satisfaction of the City of Los Angeles Director of Planning.

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE EXPOSITION PARK MASTER PLAN**

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Enforcement Agency	Monitoring Agency	Documentation of Compliance	
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<p>objects) shall be identified and recorded by way of documentation prior to commencing work.</p> <ol style="list-style-type: none"> 2. Document the relationship of these features to each other, their surroundings, and their material compositions by means of plans, sections, photographs, aerial photographs, axonometric perspectives, narratives, video, or any combination of techniques. 3. Utilize existing historic documentation in addition to the documentation prepared to evaluate the conditions and determine the age of buildings, structures, furnishings, and objects. 4. Maintain cultural landscape features by use of non-destructive methods in daily, seasonal, and cyclical tasks. Utilize maintenance practices that respect infrastructure. 5. Repairing features, materials, and edges of buildings, structures, furnishings, or objects when too deteriorated to repair. New materials shall match the old in composition, design, color, and texture. 6. Repairing surface treatment, materials, and edges when reinforcing of historic materials is needed, deteriorated, or damaged. New materials shall be Ijin-kind and match the old in composition, design, color, and texture. 7. Replacing in-kind a feature of a building, structure, furnishing, or object when too deteriorated or damaged to repair. New materials shall match the old in composition, design, color, and texture. 8. Using physical evidence of form, detailing, and alignment to reproduce a deteriorated feature. If using the same kind of material is not technically, economically, or environmentally feasible, then a compatible substitute material may be considered. Substitute material shall be submitted to OEPM, the State Architect, and the City of Los Angeles Director of City Planning for acquiring approval prior to proceeding work. 						
Biological Resources						
<p>Mitigation Measure BIO-1: To avoid impacts to nesting birds protected under the MBTA:</p> <ul style="list-style-type: none"> • Construction related to proposed projects should take place outside of the nesting bird season, which generally occurs between February 15 and September 1. • If construction activities cannot avoid the nesting bird season, pre-construction nesting bird surveys shall be conducted by a qualified biologist a maximum of three days prior to the start of construction. • Should nesting birds be discovered within or adjacent to the construction footprint during these surveys, a non-disturbance buffer shall be placed on the active nest as determined by the biologist to prevent impacts to nesting birds. • Construction shall be halted within the non-disturbance buffer set at an appropriate distance until the biologist has determined that the young have fledged and are flying well enough to avoid the proposed construction activities. The appropriate distance shall be at 	Office of Exposition Park Management	Pre-Construction; Construction	California Department of Fish and Wildlife; U.S. Fish and Wildlife Service	Office of Exposition Park Management- Qualified Biologist	Preconstruction Nesting Bird Survey and Monitoring Reports	(Signature/Date of Monitoring Agency)

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE EXPOSITION PARK MASTER PLAN**

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Enforcement Agency	Monitoring Agency	Documentation of Compliance	
					Source	Signature/Date
<p>the discretion of the qualified biologist based on factors such as the species, season, and site conditions.</p> <ul style="list-style-type: none"> • Additionally, if signs of stress are identified, the biologist shall halt activity in the immediate area until the birds resume their normal behavior or until the nest has been determined to no longer be active. 						
Cultural Resources						
<p>Mitigation Measure CULTURAL-1: <i>Avoidance of Historical Resources.</i> Prior to the initiation of ground-disturbing activities in Elements 4 (Festival Park and Community Promenade) and 8 (Zanja Madre), OEPM shall review the construction plans to ensure that any known cultural resources that are required to be avoided have been marked as “off-limits” areas for construction and construction staging. In addition, OEPM shall require monitoring of all ground-disturbing activities by a qualified archaeologist within 60 feet of a known extant unique archaeological resource or significant historical resource.</p>	Office of Exposition Park Management	Pre-Construction; Construction	Office of Exposition Park Management	Office of Exposition Park Management	Archaeological Resource Management Plan	(Signature/Date of Monitoring Agency)
<p>Mitigation Measure CULTURAL-2: <i>Worker Environmental Awareness Program.</i> Impacts to known cultural resources shall be avoided by developing a WEAP that is required to be administered to all construction personnel and visitors prior to stepping on an active construction site. This training shall include an overview of known cultural resources and those that could be encountered during the project, the appropriate procedures to follow in the event of an unanticipated discovery, an overview of the laws as they pertain to the treatment of cultural resources, including Tribal cultural resources and human remains. Any personnel on a construction site must be able to provide evidence of completion for WEAP training upon request.</p>	Office of Exposition Park Management	Pre-Construction; Construction	Office of Exposition Park Management	Office of Exposition Park Management	WEAP List of Construction Workers completing WEAP Training	(Signature/Date of Monitoring Agency)
<p>Mitigation Measure CULTURAL-3: <i>Avoidance of Known Archaeological Resources.</i> Prior to initiation of any ground-disturbing activities associated with the refined project, OEPM shall retain the services of a qualified archaeologist, who meets the Secretary of the Interior’s <i>Professional Qualification Standards for Archaeology</i>, to delineate the boundaries for each known resource within the project elements, including a 20-foot buffer around any portion of a resource having a location that is somewhat uncertain. These resource areas shall be considered sensitive zones and must be delineated on construction plans and field maps for the purpose of avoiding these resources. Construction methods for excavation in sensitive zones shall be carried out in a manner that eliminates or significantly avoids any potential impacts to cultural resources, which may include hydrovac excavation or excavation by hand as two appropriate methods among others.</p>	Office of Exposition Park Management	Pre-Construction; Construction	Office of Exposition Park Management	Office of Exposition Park Management	Archaeological Resource Management Plan	(Signature/Date of Monitoring Agency)
<p>Mitigation Measure CULTURAL-4: <i>Construction Monitoring.</i> Archaeological monitoring shall be carried out for all ground disturbing activities associated with the refined project elements. Archaeological monitoring shall be performed by or under the direct supervision of a qualified archaeologist who meets the Secretary of the Interior’s <i>Professional Qualification Standards for Archaeology</i>. At the conclusion of construction activities, a monitoring report shall be prepared and submitted to OEPM and filed at the SCCIC, including any site record forms that may have been prepared for unanticipated discoveries encountered.</p>	Office of Exposition Park Management	Pre-Construction; Construction	Office of Exposition Park Management	Office of Exposition Park Management	Archaeological Resource Management Plan	(Signature/Date of Monitoring Agency)

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE EXPOSITION PARK MASTER PLAN**

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Enforcement Agency	Monitoring Agency	Documentation of Compliance	
					Source	Signature/Date
<p>Mitigation Measure CULTURAL-5: <i>Unanticipated Discovery of Archeological Resources.</i> Impacts to newly identified significant cultural resources shall be avoided and recovered in a manner as prescribed in the Cultural Resources Treatment Plan developed for the project. It is always the preferred approach and best management practice to avoid cultural resources, leaving <i>in situ</i> whenever feasible. If avoidance is not feasible, the newly identified resource shall be recorded, recovered, and repositied at the County of Los Angeles Natural History Museum (NHM) or other repository consistent with the provisions of a Phase III data recovery program. OEPM has the delegated authority to deed archaeological or historical resources found during construction to the NHM. Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate substantial adverse changes to historical and archaeological resources eligible or listed under CRHR Criterion 4, as it preserves important information that shall otherwise be lost.</p>	Office of Exposition Park Management	Construction	Office of Exposition Park Management	Office of Exposition Park Management	Archaeological Resource Management Plan for the unanticipated discovery of archaeological resources	(Signature/Date of Monitoring Agency)
<p>Mitigation Measure CULTURAL-6: <i>Treatment of Human Remains.</i> In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.</p> <p>If the County Coroner has determined that the discovered remains are of Native American origin, then the NAHC must be contacted immediately to ascertain the most likely descendants (MLD) from the deceased individual. The coroner should make 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. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.</p> <p>If the NAHC is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the County, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.</p>	Office of Exposition Park Management	Construction	Office of the County Coroner	Office of Exposition Park Management	Contact Report Form of Contact with the Coroner's Department	(Signature/Date of Monitoring Agency)
<p>Geology and Soils</p> <p>Mitigation Measure PALEO-1: <i>Paleontological Resources – Paleontological Monitoring.</i> Impacts to paleontological resources related directly or indirectly to the destruction of a unique paleontological resource or unique geological formation from the proposed Master Plan shall be reduced to below the level of significance by monitoring, salvage, and curation at the NHM. Unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located five or</p>	Office of Exposition Park Management	Pre-Construction; Construction	Office of Exposition Park Management	Office of Exposition Park Management	Paleontological Resource Management Plan, for the unanticipated discovery of paleontological resources	(Signature/Date of Monitoring Agency)

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE EXPOSITION PARK MASTER PLAN**

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Enforcement Agency	Monitoring Agency	Documentation of Compliance	
					Source	Signature/Date
<p>more feet below the ground surface that would have the potential to contact geologic units with a high to moderate potential to yield unique paleontological resources. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, OEPM shall require and be responsible for salvage and recovery of those resources by a qualified paleontologist consistent with standards for such recovery established by the Society of Vertebrate Paleontology.¹²</p> <p>Construction monitoring by a qualified monitor (archaeologist cross-trained in paleontology or paleontologist) shall be implemented during all ground-disturbing activities that affect previously undisturbed geologic units 12 or more inches below the ground surface and have the potential to encounter geologic units with a moderate to high potential to yield unique paleontological resources. In the event that a paleontological resource is encountered during construction, all ground-disturbing activity within 100 feet of the find shall be halted until a qualified paleontologist can evaluate the significance of the discovery. Additional monitoring recommendations may be required. If the resource is found to be significant, the paleontologist shall determine the most appropriate treatment and method for stabilizing and collecting the specimen. Curation of the any significant paleontological finds shall be housed at a qualified repository, such as the NHM.</p> <p>Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation monitoring report shall be submitted to OEPM with an appended, itemized inventory with representative snapshots of specimens. The report and inventory, once submitted, shall signify the completion of the program to mitigate impacts to paleontological resources. A copy of the report/inventory shall be filed with the County of Los Angeles Department of Regional Planning and the NHM.</p>						
Hazards and Hazardous Materials						
<p>Mitigation Measure HAZ-1: Potential impacts related to exposure of people to hazards and hazardous materials during construction shall be reduced to below the level of significance by requiring soil sampling for hazardous materials and design and implementation of a Soil Management Plan to address identified materials that pose an unacceptable risk or hazard to construction workers or the public. Prior to finalizing the construction drawings for Bill Robertson Lane (Element 5) and Festival Park and</p>	Office of Exposition Park Management	Pre-Construction; Construction	Office of Exposition Park Management	Office of Exposition Park Management	Soil Management Plan	(Signature/Date of Monitoring Agency)

¹² A Qualified Professional Paleontologist (Principal Investigator, Project Paleontologist) is a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

1. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.
2. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
3. Proficiency in recognizing fossils in the field and determining their significance.
4. Expertise in local geology, stratigraphy, and biostratigraphy.
5. Experience collecting vertebrate fossils in the field.

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Mitigation Measure	Responsible Implementation Party	Monitoring Period	Enforcement Agency	Monitoring Agency	Documentation of Compliance	
					Source	Signature/Date
<p>determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for Tribal Resources. Where on-site monitoring is required, the monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal representatives and monitor have indicated that the site has a low potential for impacting Tribal cultural resources.</p> <p>In the event that previously unknown tribal cultural or archaeological resources are encountered during construction, construction activities shall cease in the immediate vicinity of the find until the find can be assessed by the qualified Tribal monitor. If the resources are Native American in origin, the Native American local Tribal contacts designated by the Native American Heritage Commission shall coordinate with OEPM regarding treatment and curation of these resources. The resources shall either be left <i>in situ</i> and avoided through redesign in accordance with Public Resources Code Section 21083.2(b), or the resources shall be salvaged, recorded, and repositied at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.¹⁶ The Cultural Resource Management Plan shall include further consultation with the Tribe. Data recovery is not required by law or regulation. It is, though, the most commonly recognized measure to mitigate adverse effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, and to preserve artifacts for future generations, as it preserves important information that shall otherwise be lost.</p> <p>Work may continue on other parts of the project while evaluation and, if necessary, additional protective mitigation takes place, in accordance with CEQA Guidelines Section 16064.5(f). The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064(f) for historical resources.</p>						
<p>Mitigation Measure TRIBAL-2: Regulatory Requirements – Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. The Tribal and/or archaeological monitor shall then notify the Tribe, the qualified lead archaeologist, and the construction manager. The discovery shall otherwise be kept confidential and secure to prevent any further disturbance. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 150 feet, or greater as determined by a qualified archaeologist, shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.</p>	Office of Exposition Park Management	Construction	Office of the County Coroner Native American Heritage Commission if Human Remains are determined to be of indigenous Native American ancestry	Office of Exposition Park Management	Contact Report Form of Contact with the Coroner's Department Contact Report Form of Contact with Native American Heritage Commission if Human Remains are determined to be of indigenous Native American ancestry	(Signature/Date of Monitoring Agency)

¹⁶ It is standard procedure to list the NHM as a receptacle for cultural resources. There is a curation fee associated, and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

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Mitigation Measure	Responsible Implementation Party	Monitoring Period	Enforcement Agency	Monitoring Agency	Documentation of Compliance	
					Source	Signature/Date
<p>If the County Coroner determines that the remains are or are believed to be Native American, the Native American Heritage Commission (NAHC) in Sacramento shall be notified within 24 hours of the determination. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC shall immediately notify the person(s) it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the OEPM, the disposition of the human remains. The MLD's recommendation shall be followed if feasible and may include scientific removal and nondestructive analysis of the human remains and any items associated with Native American burials. If OEPM rejects the MLD's recommendations, the agency shall reburial the remains with appropriate dignity on the property within a time frame agreed upon between OEPM and the MLD's in a location that shall not be subject to further subsurface disturbance (14 California Code of Regulations §15064.5(e)). There shall be no publicity regarding any Tribal cultural materials recovered.</p>						