IV. Mitigation Monitoring Program

IV. Mitigation Monitoring Program

1. Introduction

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

The evaluation of the Project's impacts in this Environmental Impact Report (EIR) takes into consideration the Project design features and applies mitigation measures needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the Project design features and mitigation measures identified in the EIR for the Project.

The City of Los Angeles (City) is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. While certain agencies outside of the City may be listed herein as the monitoring/enforcement agencies for individual Project design features and mitigation measures, the City, as Lead Agency for the Project, is responsible for overseeing and enforcing implementation of the MMP as a whole.

2. Organization

As shown on the following pages, each identified Project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency—the agency with the power to enforce the Project design feature or mitigation measure.
- Monitoring Agency—the agency to which reports involving feasibility, compliance, implementation, and development are made.

- Monitoring Phase—the phase of the Project during which the Project design feature or mitigation measure shall be monitored.

- Monitoring Frequency—the frequency at which the Project design feature or mitigation measure shall be monitored.

- Action Indicating Compliance—the action by which the Enforcement Agency or Monitoring Agency indicates that compliance with the identified Project design feature or required mitigation measure has been implemented.

3. Administrative Procedures and Enforcement

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each Project design feature and mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate Monitoring and Enforcement Agencies that each Project design feature and mitigation measure has been implemented. The Applicant shall maintain records demonstrating compliance with each Project design feature and mitigation measure, as required. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of Project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall prepare documentation of the Applicant's compliance with the Project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Annual Compliance Report. The Construction Monitor shall be obligated to immediately notify the Applicant of any non-compliance with the Project design features and mitigation measures. If the Applicant does not correct any non-compliance within two days from the time of notification, the Construction Monitor shall be obligated to report such non-compliance to the Enforcement Agency. Any continued non-compliance shall be appropriately addressed by the Enforcement Agency.

4. Program Modification

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval.

The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the Project design features and mitigation measures contained in this MMP. The enforcing departments or agencies may determine substantial conformance with Project design features and mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a Project design feature or mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of any Project design feature or mitigation measure. Any addendum or subsequent CEQA clearance that may be required in connection with the modification or deletion shall explain why the Project design feature or mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the Project design feature or mitigation measure. Under this process, the modification or deletion of a Project design feature or mitigation measure shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the Project design feature(s) or mitigation measure(s) results in a substantial change to the Project or the non-environmental conditions of approval.

5. Mitigation Monitoring Program

A. Aesthetics, Views, Light/Glare, and Shading

(1) Project Design Features

AES-PDF-1: The Project Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** During field inspection(s)
- **Action Indicating Compliance:** Field inspection sign-off

AES-PDF-2: New on-site utilities that may be required to serve the Project shall be installed underground.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

AES-PDF-3: Glass used in building façades shall be low-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., limit the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency**: Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

B. Air Quality

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

C. Biological Resources

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

Mitigation Measure IS-1: To the extent feasible, Project tree removal activities shall be scheduled outside the nesting season for migratory birds (typically from February 15 to August 31). However, to the extent that Project tree removal activities must occur during the nesting season, all suitable habitat shall be thoroughly surveyed by a qualified biologist for the presence of nesting birds prior to removal. If any active nests are detected, the area shall be flagged, along with a minimum 50-foot buffer (this buffer may range between 50 and 300 feet, as determined by the monitoring biologist), and shall be avoided until the nesting cycle has completed or the monitoring biologist determines that the nest has failed. The results of the survey(s) shall be reported to the City of Los Angeles (i.e., the lead agency) to document compliance with applicable state and federal laws pertaining to the protection of nesting birds.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction, construction
- **Monitoring Frequency:** Plan check approval; issuance of grading permit; periodically during construction
- **Action Indicating Compliance:** Issuance of grading permit

D. Cultural Resources

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

CUL-MM-1: The Project Applicant or its successor shall retain a qualified paleontologist to perform periodic inspections of excavation and grading activities at the Project Site.[1] The frequency of inspections shall be based on consultation with the qualified paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the qualified paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The qualified paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant or its successor shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the qualified paleontologist's recommendations have been implemented to the satisfaction of the qualified paleontologist.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** To be determined by consultation with paleontologist if resource(s) are discovered

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[1] *According to the Society of Vertebrate Paleontology, a qualified paleontologist generally shall have the following qualifications or equivalent: a graduate degree in paleontology or geology and/or a publication record in peer reviewed journals; demonstrated competence in the field and regional experience; at least two full years professional experience; proficiency in recognizing fossils in the field and determining their significance; expertise in local geology, stratigraphy, and biostratigraphy; experience collecting vertebrate fossils in the field. Source: Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010, http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx, accessed April 3, 2018.*

- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified paleontologist

E. Geology and Soils

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

Mitigation Measure IS-2:[2] All foundations to support the proposed structure shall bear in competent unweathered Fernando Formation bedrock. In particular, the high-rise portion of the structure shall be supported by a mat foundation system, bearing in competent Fernando Formation bedrock. The podium portion of the structure that will be underlain by the subterranean level shall be supported by conventional foundations, deepened to bear in competent Fernando Formation bedrock. In addition, the podium portion of the structure that will be built at-grade shall be supported by end-bearing belled caissons, deepened to bear in competent Fernando Formation bedrock; excepting therefrom any portions of the podium structure that connect to Metro's 2nd Street/Broadway rail station facilities structure.

All foundation excavations shall be observed by a qualified geotechnical engineer to verify penetration into the recommended bearing materials. These observation(s) shall be performed prior to the placement of reinforcement. If necessary, foundations shall be further deepened to extend into satisfactory geologic materials.

Alternatively, the proposed structure's foundations may be designed based on the findings of a site-specific, design-level geologic and geotechnical investigation(s) approved by the City, including but not limited to the use of proven methods generally accepted by registered engineers to reduce the risk of seismic hazards to a less than significant level, provided such recommendations meet or exceed applicable regulatory requirements, including, but not limited to, the version of the California Building Code, as adopted and amended by the City, in effect at the time of the City's approval of the geotechnical investigation(s); relevant state, County, and City laws, ordinances, and Code requirements; and current standards of practice designed to minimize potential geologic and geotechnical impacts. The Project

[2] *This mitigation measure is incorrectly identified as Mitigation Measure IS-1 on page B-17 of the Project's Initial Study, provided in Appendix A of the Draft EIR.*

also shall comply with the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of grading permit; field inspection sign-off

Mitigation Measure IS-3:[3] Any proposed vertical excavations shall be stabilized with the aid of a temporary shoring system, which shall be designed by a qualified shoring engineer in accordance with the provisions of the applicable version of the California Building Code and City of Los Angeles Building Code, as well as relevant recommendations provided by the geotechnical engineer. During the Plan Check process, the City of Los Angeles Department of Building and Safety and the geotechnical engineer of record shall review the shoring design to verify it conforms to the applicable building codes and geotechnical recommendations.

The temporary shoring system shall consist of steel soldier piles placed in drilled holes and backfilled with concrete. Depending on the depth of the shoring walls, the soldier piles may be designed as cantilevered, laterally braced utilizing tie-back anchors, or internally braced. Lagging timber boards shall be installed between the soldier piles throughout the entire depth of the shored excavation to prevent caving or raveling of the exposed soils.

Alternatively, shoring systems may be designed based on the findings of a site-specific, design-level geologic and geotechnical investigation(s) approved by the City, including but not limited to the use of proven methods generally accepted by registered engineers to reduce the risk of seismic hazards to a less than significant level, provided such recommendations meet or exceed applicable regulatory requirements, including, but not limited to the version of the California Building Code, as adopted and amended by the City, in effect at the

[3] *This mitigation measure is incorrectly identified as Mitigation Measure IS-2 on page B-20 of the Project's Initial Study, provided in Appendix A of the Draft EIR.*

time of the City's approval of the geotechnical investigation(s); relevant state, County, and City laws, ordinances, and Code requirements; and current standards of practice designed to minimize potential geologic and geotechnical impacts. The Project also shall comply with the conditions contained within the City Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of grading permit; field inspection sign-off

F. Greenhouse Gas Emissions

(1) Project Design Features

GHG-PDF-1: The design of the new building shall incorporate the following sustainability features:

- Exceed Title 24, Part 6, California Energy Code baseline standard requirements by 10 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements.
- Incorporate energy-saving technologies and components to reduce the Project's electrical use profile. Examples of these components include the use of light-emitting diode (LED) and other efficient lighting technology, energy saving lighting control systems such as light- and motion-detection controls (where applicable), and energy efficient heating, ventilation, and air conditioning (HVAC) equipment.
- HVAC mechanical systems and building lighting shall be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- Demand control ventilation shall be utilized in HVAC systems, and refrigerants in HVAC equipment shall have low GHG emission rates. In particular, the HVAC system shall be designed to optimize exterior and interior air-flow to ensure healthy indoor air quality.

- Install occupancy-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.
- Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
- Incorporate energy-efficient design methods and technologies such as a centralized chiller plant with rooftop ventilation, high performance window glazing, passive design and façade shading devices, high efficiency domestic water heaters, and enhanced insulation to minimize solar heat gain.
- Built-in appliances, refrigerators, and space-conditioning equipment shall meet or exceed the minimum efficiency levels mandated in the California Code of Regulations. High-efficiency Energy Star–rated products and appliances shall be installed, as available.
- Fenestration shall be designed for solar orientation (i.e., window systems shall be designed to reduce thermal gain and loss), thus reducing cooling loads during warm weather and heating loads during cool weather.
- Use of water-efficient plantings with drought-tolerant species.
- Conduct a performance check of the installed space-conditioning system prior to issuance of a Certificate of Occupancy to ensure that energy-efficiency measures incorporated into the Project operate as designed.
- Complete post-construction commissioning of building energy systems prior to issuance of a Certificate of Occupancy.
- Allocate preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

GHG-PDF-2: Upon buildout of the Project, at least 20 percent of code-required parking spaces within the existing parking garage shall be capable of supporting electric vehicle supply equipment (EVSE). Five percent of

the total code-required parking spaces will be provided with EV chargers to immediately accommodate electric vehicles within the parking garage. When the application of the specified percentage results in a fractional space, the calculation shall round up to the next whole number. Plans shall indicate the proposed type and location(s) of EVSE and also include raceway (enclosed conduit) method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. For EV-ready wiring, only raceways and related components are required to be installed at the time of construction. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

G. Hazards and Hazardous Materials

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

HAZ-MM-1: Preparation of a Soil Management Plan (SMP): Prior to the issuance of a grading permit, a qualified environmental professional as defined by 40 CFR 312.10 shall be retained to prepare a SMP to guide the development of the below-grade portions of the Project Site (excepting those portions of the Project Site that are owned by Metro and that

were excavated as part of the Regional Connector 2nd Street/ Broadway rail station and portal).[4] The SMP shall document the historical conditions known about the Project Site and be prepared and executed in compliance with all applicable regulatory requirements. The SMP shall:

- Be implemented during soil disturbing construction activities (excavation and/or grading) to address any residual soil contamination and to ensure that any contaminated soils are properly identified, excavated, and disposed of off-site or remediated on-site.
- Include practices that are consistent with the California Division of Occupational Safety and Health regulations, California Code of Regulations, Title 8, as well as Certified Unified Program Agency remediation standards that are protective of the planned use.
- Document the historical conditions known about the Project Site and be prepared and executed in compliance with all applicable regulatory requirements;
- Address any residual soil contamination and to ensure that any contaminated soils are properly identified, excavated, and disposed of off-site or remediated on-site.
- Require that a qualified environmental professional or their designated representative be present on the Project Site during grading and excavation activities to sample and screen any potential residual soil contamination should it be encountered.

The qualified environmental professional shall use visual identification (such as discolored soils) and/or a screening (organic vapor) meter to identify any residual soil contamination. If potential residual soil contamination is observed based on the visual identification or the screening meter, excavation and grading within such area shall be temporarily halted and redirected around the area until the contamination is evaluated by the qualified environmental professional using appropriate sampling and analytical techniques. The nature and extent of contamination shall be determined and the appropriate handling, disposal, and/or treatment of the contaminated soil shall be

[4] *To be considered a qualified environmental professional, a person must hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) and have the equivalent of three years of full-time relevant experience; or be licensed or certified by the federal government, a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) to perform environmental inquiries as defined in Section 312.21 and have the equivalent of three years of full-time relevant experience; or a have Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five years of full-time relevant experience; or have the equivalent of ten years full-time experience.*

implemented in accordance with all applicable regulatory requirements.

The SMP also shall provide/include, as applicable, the following:

- Protocols and procedures for properly handling contaminated soil that may be encountered and to protect human health and the environment during soil disturbing construction activities (excavation and/or grading);
- Procedures for segregation of visibly impacted soil/characterization/ off-site disposal (if encountered), health and safety training, soil stockpile management (if conducted), import fill placement (if needed), and environmental site controls for stormwater and dust during the development activities;
- Action levels and air monitoring procedures for worker and community safety.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; California Department of Toxic Substances Control
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of grading permit; field inspection sign-off

HAZ-MM-2: If any UST is encountered, a Division 5 Permit shall be obtained from the LAFD to abandon/remove the tank(s). The contractor removing the tank(s) shall be required to have a proper and current Los Angeles City Business Tax Registration Certificate and Appropriate State of California Contractor's License. Soil sampling shall be conducted by a qualified environmental professional or their designated representative per LAFD requirements during UST removal and the results of the sampling activities along with the removal activities shall be submitted in a tank removal report to the LAFD. Based on the results of the soil sampling, the LAFD may require additional site assessment and as appropriate remediation, if impacted soils are identified during the UST removal.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Fire Department
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Fire Department

- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during field inspection
- **Action Indicating Compliance:** Field inspection sign-off; issuance of Division 5 Permit and submittal of tank removal report to LAFD, if required; notice of No Further Action, if remediation is required

H. Hydrology, Surface Water Quality, and Groundwater

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

I. Land Use

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

J. Noise

(1) Project Design Features

NOI-PDF-1: Project construction shall prohibit the use of driven (impact) pile systems.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** During field inspection(s)
- **Action Indicating Compliance:** Field inspection sign-off

NOI-PDF-2: All outdoor mounted, noise-generating mechanical equipment would be screened from off-site noise-sensitive receptors.[5]

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

NOI-PDF-3: Loading and trash collection areas would be screened from off-site noise-sensitive receptors.[6]

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

NOI-PDF-4: Outdoor amplified sound systems (e.g., speaker and stereo systems, amplification systems, or other sound-producing devices) would be designed so as not to exceed maximum noise levels of: (i) 75 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet from the amplified sound systems at the ground level paseo; (ii) 85 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet for the Levels 8 and 15 pool/roof decks; and (iii) 95 dBA ($L_{eq\text{-}1hr}$) at a distance of 25 feet for any amplified sound system at the Level 27 roof deck.

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[5] *In accordance with the L.A. CEQA Thresholds Guide, noise-sensitive uses include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds and parks.*

[6] *In accordance with the L.A. CEQA Thresholds Guide, noise-sensitive uses include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds and parks.*

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-operation; operation
- **Monitoring Frequency:** Once at Project plan check; once at field inspection during operation; annually during operation
- **Action Indicating Compliance:** Plan check approval and issuance of building permit; field inspection sign-off; documentation of noise management activities in annual compliance report

NOI-PDF-5: Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators shall be used during construction. In particular, solar-powered generators shall be used for the construction trailer(s) on-site.[7]

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during field inspection
- **Action Indicating Compliance:** Field inspection sign-off

(2) Mitigation Measures

NOI-MM-1: A 12-foot-high temporary and impermeable sound barrier shall be erected along the northern property line of the Project Site between the construction area and the proposed mixed-use development located north of the Project Site across 2nd Street (receptor R6). Pedestrian access to/from the on-site Metro station shall be provided as required by and in consultation with Metro. The temporary sound barrier shall be designed to provide a minimum 10-dBA noise reduction at ground level. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.[8]

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[7] *However, for purposes of a conservative analysis, the noise modeling performed for the Project assumes the use of diesel and gas-powered generators during construction.*

[8] *In the event the Times Mirror Square project is not completed and occupied prior to or during Project construction, this mitigation measure shall not be required.*

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of grading permit; field inspection sign-off

K. Population, Housing, and Employment

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

L.1. Public Services—Police Protection

(1) Project Design Features

POL-PDF-1: During construction, the Project Applicant or its successor shall implement appropriate temporary security measures, including, but not limited to, security fencing, low-level security lighting, and locked entry. During construction activities, the Project's contractor will document the security measures being implemented.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety
- **Monitoring Agency** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during field inspection
- **Action Indicating Compliance:** Field inspection sign-off

POL-PDF-2: During operation, the Project shall include access controls in the form of private on-site security, a closed circuit security camera system, 24-hour controlled access for the office and residential floors, and security patrols of the parking structure.

- **Enforcement Agency:** City of Los Angeles Police Department, City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Annually
- **Action Indicating Compliance:** Documentation of private on-site security in annual compliance report.

POL-PDF-3: The Project shall provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

POL-PDF-4: The Project shall provide sufficient lighting in and around the existing parking garage to maximize visibility and reduce areas of concealment.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

POL-PDF-5: The Project entrances to, and exits from, the building, open spaces, and pedestrian walkways shall be designed, to the extent practicable, to be open and in view of surrounding sites.

- **Enforcement Agency:** City of Los Angeles Police Department, City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

POL-PDF-6: Prior to the issuance of a building permit, the Project Applicant or its successor shall consult with LAPD's Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Department of City Planning
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once at Project plan check
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit

POL-PDF-7: Prior to the issuance of a certificate of occupancy, the Project Applicant or its successor shall submit a diagram of the Project Site to the LAPD Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

- **Enforcement Agency:** Los Angeles Police Department; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-operation
- **Monitoring Frequency:** Once prior to the issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

L.2. Public Services—Fire Protection

(1) Project Design Features

FIR-PDF-1: Install a fire flow pump system in the building, designed in accordance with LAMC fire flow pressure standards, such that a minimum residual water pressure of 20 psi shall remain in the water system while the required fire flows are flowing per Fire Code requirements.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Fire Department
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Fire Department
- **Monitoring Phase:** Pre-operation
- **Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

L.3. Public Services—Schools

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

L.4. Public Services—Parks and Recreation

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

L.5. Public Services—Libraries

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

M. Transportation/Traffic

(1) Project Design Features

TR-PDF-1: Prior to the start of construction, the Project Applicant shall prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall formalize how construction will be carried out and identify specific actions required to reduce effects on the surrounding community. The Construction Traffic Management Plan shall be based on the nature and timing of the specific construction activities for the Project and shall consider other projects under construction in the immediate vicinity of the Project Site. Accordingly, the Construction Traffic Management Plan shall include, but not be limited to, the following features, as appropriate:

- Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on- and off-site locations;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring properties;
- Coordinate with public transit agencies to provide advanced notifications of any temporary transit stop relocations and durations and follow all safety required procedures required by the concerned agency;
- Limit any potential roadway lane closure(s) to off-peak travel periods, to the extent feasible;
- Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation;

- To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Identify the routes that construction vehicles will utilize for the delivery of construction materials (i.e. lumber, tiles, piping, windows, etc.), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project;
- Require the Applicant to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of construction activities;
- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by Caltrans or LADOT;
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed;
- Haul trucks entering or exiting public streets shall at all times yield to public traffic;
- Construction-related parking and staging of vehicles shall occur on-site to the extent possible, but may occur on nearby public parking lots, as approved by the City;
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times;
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site; and
- The Construction Traffic Management Plan shall meet standards established in the current California Manual on Uniform Traffic Control Device (MUTCD) as well as City of Los Angeles requirements.
- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Pre-construction; construction

- **Monitoring Frequency**: Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of grading permit; field inspection sign-off

TR-PDF-2: The Project Applicant shall prepare and implement a Transportation Demand Management (TDM) Program to reduce peak-hour vehicular traffic to and from the Project Site. A formal Preliminary TDM Plan shall be developed in conjunction with LADOT and shall be required prior to issuance of a building permit for the Project. This preliminary plan shall include, at a minimum, measures consistent with the City's Trip Reduction Ordinance. A Final TDM Plan shall be required prior to issuance of any Certificate of Occupancy. A Covenant and Agreement shall be enacted to ensure the TDM plan is maintained. The TDM plan may include, but shall not be limited to, the following measures:

- On-Site Employee Transportation Coordinator—An on-site Employee Transportation Coordinator (ETC) may be designated for the Project. The ETC would manage all aspects of an enhanced TDM program and also would participate in City-sponsored workshops and information roundtables. The ETC would establish a Transportation Information Center and Transportation Fairs. The Transportation Information Center would provide on-site information at its buildings for employees and visitors about local public transit services (including bus lines, rail lines and connections, rideshare programs and shuttles), and bicycle facilities (including routes, rental and sales locations, on-site bicycle racks and showers). Walking and biking maps also would be provided for employees, visitors and residents, which would include but not be limited to information about convenient local services and restaurants within walking distance of the Project. Such transportation information may be provided through a computer terminal with access to the Internet, as well as through the office of the ETC located at the Project Site. Transportation information should be maintained at the administrative offices of the building, or by directing inquiries to the building's web site as a portal;
- TDM Website Information—Transportation information should be provided in a highly visible and accessible location on the building's web site, including links to local transit providers, area walking, bicycling maps, etc., to inform employees, visitors, and residents of available alternative transportation modes to access the Project Site, other amenities in the area, and travel opportunities in the area. The website also should highlight the environmental benefits of utilization of alternative transportation modes;
- TDM Promotional Material—Provide and exhibit in public places information materials on options for alternative transportation

modes and opportunities. In addition, transit fare media and day/month passes should be made available to employees and visitors during typical business hours;

- Transit Welcome Package—All new employees could be provided with a Transit Welcome Package (TWP) in addition to holding a Transportation Fair on an annual basis. The TWP at a minimum could include information regarding each employer's arrangements for free or discounted use of the transit system, area bus/rail transit route and connections/transfers information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the Project;
- Carpool Program for Employees—Provide preferential parking within the on-site parking garage for employees who commute to work in registered carpools. An employee who drives to work with at least one other employee to the site may register as a carpool entitled to preferential parking within the meaning of this provision;
- Guaranteed Ride Home Program for Employees—Provide employees who carpool/rideshare with a reimbursed ride home in the event of a valid emergency.
- Public Transit Stop Enhancements—Work in cooperation with LADOT and other transit agencies to improve existing bus stops with enhanced shelters and transit information within the immediate vicinity of the building. Enhancements could include enhanced weather/sun protection, lighting, benches, and trash receptacles. These improvements would be intended to make riding the bus a safer and more attractive alternative. In addition, coordination with the City's Bureau of Engineering is recommended in regards to the corresponding streetscape elements/design in association with the Broadway Streetscape Master Plan project and the Downtown Los Angeles Historic Streetcar project;
- Convenient Parking/Amenities for Bicycle Riders—Consistent with LAMC requirements, provide locations at the Project Site for convenient bicycle parking for employees, residents, and visitors. Bicycle parking shall be located outside and adjacent to the building as well as within the on-site parking structure such that long-term and short-term parkers can be accommodated. Bicycle parking may include bicycle racks, locked cages, or another similar parking area. Provide shower facilities for employees who commute to work via bicycle. In addition, Metro may provide additional bicycle parking within the Metro plaza;
- Local Hiring Program—To the extent feasible, when hiring conduct outreach to residents who live within Downtown Los Angeles based on satisfaction of other requirements of the available positions;

- Flexible/Alternative Work Schedules—Encourage tenants in the building to offer flexible or alternative work schedules, as well as the opportunity to telecommute if feasible; and
- Parking Cash-Out Program—Require in all leases it executes as landlord for space within the Project that tenants offer a parking cash-out program. Parking cash-out program refers to an employer-funded program under which an employer offers in-lieu of any parking subsidy, a transit subsidy or cash allowance (for use of alternative modes such as walking and bicycling) of equal or greater value.
- City of Los Angeles Bicycle Trust Fund Contribution—The Project Applicant shall make a one-time fixed-fee contribution of $50,000 to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the general Downtown Los Angeles area of the Project.
- LADOT Mobility Hub Program—The Project Applicant shall make a one-time fixed-fee contribution to LADOT to be used in the implementation of the Mobility Hub in the general area of the Project.
- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Pre-operation
- **Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy; annually during operation
- **Action Indicating Compliance:** Approval of TDM program from City of Los Angeles Department of Transportation; issuance of Certificate of Occupancy; documentation of TDM program in annual compliance report

(2) Mitigation Measures

TR-MM-1: To enhance the traffic signal system in the Project study area and in response to the forecast significant Project impacts, the Project Applicant shall contribute a fixed-fee financial contribution toward funding traffic signal upgrades for the following study intersections along the Figueroa Street and Alameda Street corridors:

- Intersection No. 8: Figueroa Street & 2nd Street
- Intersection No. 9: Figueroa Street & 3rd Street/SR-110 Ramps

- Intersection No. 31: Alameda Street & Arcadia Street/US-101 NB Off-Ramp.

Based on coordination with LADOT and as indicated in LADOT's assessment letter, the funding contribution towards the above traffic signal upgrades will total approximately $105,000.00. This, and any other required financial fair-share contributions, must be guaranteed prior to issuance of the Project's building permit and completed prior to the issuance of the Project's certificate of occupancy. Also, any Project-related financial fair-share contribution payments must be deposited into the appropriate City account prior to issuance of the Certificate of Occupancy.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Written guarantee of payment and subsequent issuance of building permit; written verification of payment of fees to the City of Los Angeles Department of Transportation and subsequent issuance of Certificate of Occupancy

N. Tribal Cultural Resources

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

O.1. Utilities and Service Systems—Water Supply and Infrastructure

(1) Project Design Features

WAT-PDF-1: The Project design shall incorporate the following design features to support water conservation in excess of LAMC requirements:

- High-efficiency toilets with a flush volume of 1.1 gallons of water per flush or less, including dual-flush water closets.
- No-flush or waterless urinals in all non-residential restrooms.
- Non-residential restroom faucets with a maximum flow rate of 0.35 gallon per minute and a self-closing design.
- Non-residential sensor-operated kitchen faucets (except restaurant kitchens) with a maximum flow rate of 0.5 gallon per minute.
- Residential bathroom and kitchen faucets with a maximum flow rate of 1.0 gallon per minute.
- Residential showerheads with a flow rate no greater than 1.5 gallons per minute.
- High-efficiency, Energy Star–rated residential clothes washers with a water factor of 4.0 or less for top-loading machines and/or a water factor of 3.6 or less for front-loading machines.
- High-efficiency standard and/or compact Energy Star–rated residential dishwashers that use 3.0 gallons of water or less per cycle.
- Leak detection system for any domestic water systems, swimming pool, Jacuzzi, or other comparable spa equipment installed on-site.
- Drip/microspray/subsurface irrigation where appropriate.
- Matched precipitation (flow) rates for sprinkler heads.
- Proper hydro-zoning and turf minimization.
- Landscape contouring to minimize precipitation runoff.
- Minimum irrigation system distribution uniformity of 75 percent.
- Landscape contouring/bioswales, rain gardens, cisterns, and tree pits to minimize precipitation runoff.
- Native and/or drought-tolerant plant materials—approximately 72 percent of total landscaping.
- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection

- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

O.2. Utilities and Service Systems—Wastewater

(1) Project Design Features

No Project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

O.3. Utilities and Service Systems—Solid Waste

(1) Project Design Features

SW-PDF-1: The Project shall provide clearly marked, durable on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers during operation.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Public Works, Bureau of Sanitation
- **Monitoring Agency:** City of Los Angeles Department of Public Works, Bureau of Sanitation
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

SW-PDF-2: Building materials with a minimum of 10 percent recycled-content shall be used for Project construction.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety

- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; field inspection sign-off

SW-PDF-3: During construction, the Project shall implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous construction debris.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; field inspection sign-off

SW-PDF-4: During operation, the Project shall implement a solid waste diversion program to provide for the diversion (through source reduction, reuse, recycling, composting, etc.) of 75 percent of operational waste.

- **Enforcement Agency:** City of Los Angeles Department of Public Works, Bureau of Sanitation
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of Public Works, Bureau of Sanitation
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Annually
- **Action Indicating Compliance:** Documentation in annual compliance report.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

P. Energy Conservation and Infrastructure

(1) Project Design Features

ENG-PDF-1: Natural gas-fueled fireplaces shall be limited to up to 20 percent of the proposed residential units.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; pre-operation
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.