

**ATTACHMENT D**  
**MITIGATION MONITORING AND REPORTING PROGRAM**

## Section 4

# Mitigation Monitoring and Reporting Program

A Mitigation Monitoring and Reporting Program (MMRP) describes the procedures that will be followed to implement the mitigation measures adopted in connection with the approval of the proposed project and the methods for monitoring such actions. The MMRP has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act (CEQA). The intent of the program is to (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the monitoring program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes wherever feasible. A MMRP is necessary only for impacts which would be significant if not mitigated. The following table consists of the mitigation measures associated with the proposed project and provides an entry for each measure that notes the timing of the measure, the responsible entity for mitigation monitoring, an entry to record when the mitigation measure was completed, and the measures effectiveness.

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**Table 4-1 Mitigation Monitoring and Reporting Program**

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
<b>Air Quality</b>						
<b>MM-AQ-1:</b> Tier 3 Emission Standards. All off-road engines during construction shall meet the Tier 3 emission standards during the building construction phase for both the North and South Parcels.	Construction Contractor	During construction	Department of Planning and Community Development			
<b>MM-AQ-2:</b> Diesel Particulate Filters. All off-road diesel engines during construction must be equipped with diesel particulate filters capable of reducing PM10 and PM2.5 emissions by at least 50 percent the uncontrolled emission rate of the construction equipment.	Construction Contractor	During construction	Department of Planning and Community Development			
<b>Cultural Resources</b>						
<b>MM-CR-1:</b> Historic American Building Survey Documentation. The applicant shall be responsible for preparing documentation of the H.G. Loud Autos site (North Parcel) using the Historic American Building Survey (HABS) Level III standards as the guideline for recording the building through photographs, drawings and a written description. The HABS documentation shall be reviewed and approved by the City of Pasadena Department of Planning and Community Development: Design and Historic Preservation Section staff as a condition of approval of the project and prior to issuance of a demolition permit. The following documentation shall be prepared to document and record the historic resource:  a. Written Data: Additional research shall be performed to document the history of the site and the auto-related businesses located therein dating from the early twentieth-century. The additional research shall be used to gain a more complete understanding of the history of the auto industry in Pasadena, and the use of the International Style architecture for the various brands of automobiles and their dealerships in Pasadena and Los Angeles County.  b. Drawings: Under HABS Level III, if the original	Project Applicant	Prior to issuance of demolition permit	Department of Planning and Community Development, Design and Historic Preservation Section			

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<p>drawings of the H. G. Loud Autos complex prepared by Sylvanus Marston are available, they shall be reproduced in ink on Mylar. If the original drawings/plans for the H. G. Loud Autos complex cannot be located, then sketch plans depicting the floorplans of the current conditions of the buildings and structures shall be prepared by a licensed architect. A copy of the current site plan shall be included with the sketch drawings of the floorplans. The current condition drawings shall be reproduced on Mylar, and in digital format.</p> <p>c. Photographs: Under HABS Level III, a representative number of large-format photographs and negatives shall be produced to capture interior and exterior views of each building and structure of the H. G. Loud Autos complex on the North Parcel. The large format photos shall be supplemented with color digital photographs to fully document the property. At least four large format photographs shall be taken to show the property's setting in context, and in relationship to, its location on East Colorado Boulevard.</p> <p>d. Document: The HABS Level III document shall be produced on archival-quality paper, and all large format photographs and negatives labeled to HABS standards. The HABS document shall be donated to the archives of the Pasadena Museum of History.</p>						
<p><b>MM-CR -2:</b> Interpretive Display Presenting Site History. The applicant will be responsible for a "history of the automobile in Pasadena" interpretive display that shall be available for public viewing in one of the remaining showroom sections of the H. G. Loud Autos complex. The interpretive display shall present a history of the site and the significance of the International Style of architecture to the automobile-related industry of Pasadena. The interpretive display shall be prepared by a qualified Historian, Architectural Historian, or organization (such as the Peterson Automotive Museum or California Route 66 Museum) with experience in</p>	Project Applicant	<p>Design and content shall be approved prior to issuance of demolition permit</p> <p>Installation shall be completed and inspected prior to a certificate of occupancy for the</p>	Department of Planning and Community Development: Design and Historic Preservation Section			

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creating such materials for educational purposes. The design and content of the interpretive display shall be approved by the City of Pasadena Department of Planning and Community Development: Design and Historic Preservation Section staff prior to demolition activities on the project site.		showroom building				
<b>MM-CR -3:</b> Preservation, Restoration, Adaptive Use Plan. The applicant shall be responsible for developing a Preservation, Restoration, Adaptive Reuse plan for the rehabilitated showroom portions of the showroom-administration-repair buildings and for the relocation/restoration of the “Welcome” sign. The showrooms shall be rehabilitated to serve alternative use/s for the proposed Project, and the “Welcome” sign shall be installed within one of the showroom spaces or in another place visible from Colorado Boulevard. Suggested reuses of the showrooms, such as to include an interpretive display, are discussed in MM-CR-2. The rehabilitation shall follow the Secretary of the Interior’s Guidelines for the Treatment of Historic Properties, and the services of a Historic Architect or Architectural Historian who meets the Secretary of the Interior’s Standards for Professionals and who has sufficient experience with using the Guidelines shall be retained to assist the project team to develop a Preservation, Restoration, Adaptive Use Plan. As part of the rehabilitation program, a Historic Structures Report (HSR) shall be prepared to document current conditions and present proposed alterations to the building per the Guidelines.	Project Applicant	Prior to issuance of demolition permit	Department of Planning and Community Development, Design and Historic Preservation Section			
<b>MM-CR-4:</b> Photodocumentation. Prior to any construction activities, the applicant will be responsible to have a qualified Architectural Historian or Historic Architect prepare a photodocumentation of the exterior of the F. Suie One Antiques Store building. A set of detailed photographs of exterior facades will be used to assist in the repair of any unanticipated vibration-caused or other construction-related damage (see also MM-	Project Applicant	Prior to issuance of demolition permit	Department of Planning and Community Development, Design and Historic Preservation Section			

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NOISE-6, MM-NOISE-7, and MM-NOISE-9 regarding mitigation of construction-related vibration damage to historic structures).						
<b>MM-CR-5:</b> Repair of Construction-Related Damage to Showroom. In the event of unanticipated construction-related damage to the historic showroom sections of the project, the applicant shall be responsible for restoring the buildings to their historic appearance by application of the Secretary of the Interior’s Guidelines for the Treatment of Historic Properties. Project management shall retain the services of a historic architect or architectural historian who meets the Secretary of the Interior’s Standards for Professionals, and has at least 10 years of experience with using the Guidelines, to assist the project team to develop a restoration plan of the showrooms.	Project Applicant	During construction	Department of Planning and Community Development, Design and Historic Preservation Section			
<b>MM-CR-6:</b> Paleontologist Retained during Construction. A qualified Paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the Older Quaternary Alluvium on the project site. The Paleontologist shall be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The schedule and extent of monitoring activities shall be determined at the meeting in consultation with the City of Pasadena. Although exact depths are not possible to determine at this time, Older Alluvium is typically present below five feet from current ground surface; therefore, monitoring will likely be needed where undisturbed Older Alluvium occurs below five feet. This will be more definitively assessed at the pre-grading meeting. If any scientifically important large fossil remains are uncovered during earth-moving activities, the Paleontologist shall divert heavy equipment away from the fossil site until s/he has had an opportunity to examine and remove the remains. Samples of Older Quaternary Alluvium shall be collected for processing and examination for very	Construction Contractor	During grading/ excavation	Department of Planning and Community Development			

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<p>small vertebrate fossils.</p> <p>All paleontological work to assess and/or recover a potential resource at the project site shall be conducted under the direction of the qualified Paleontologist. Any fossils recovered during Project site development, along with their contextual stratigraphic data, shall be donated to an appropriate institution with an educational and research interest in the materials. The Paleontologist shall prepare a report of the results of any findings as part of a testing/mitigation plan following accepted professional practice.</p>						
<b>Hazards and Hazardous Materials</b>						
<p><b>MM-HAZ-1:</b> Encountering Contaminated Soil. If soil is encountered during project construction that is identified or suspected of being impacted by hazardous materials (on the basis of staining, chemical odors, or other evidence), work at the subject construction activity area will be halted and the suspect site conditions will be evaluated by a qualified environmental professional. The results of the evaluation will be submitted to the Pasadena Fire Department (PFD), the Department of Toxic Substances Control (DTSC), and/or the California Regional Water Quality Control Board (RWQCB), if/as appropriate, and the necessary response/remedial measures will be implemented, as directed by DTSC, RWQCB, LACoFD, PFD, or other applicable oversight agency, until all specified requirements of the oversight agencies are satisfied and a no-further action status determination is attained, if/as appropriate.</p>	Construction Contractor	During grading/ excavation	Department of Planning and Community Development, Fire Department			
<p><b>MM-HAZ-2:</b> Clarifier and UST Removal and Closure. Prior to the issuance of a grading permit, all subgrade clarifiers and underground storage tanks shall be removed and closed to current regulatory standards, in accordance with all Pasadena Fire Department (PFD) regulations, and shall also include compliance with SCAQMD Rule 1166 relative to monitoring for, and management of, soils contaminated by VOC's</p>	Construction Contractor	During demolition and grading/excavation	Department of Planning and Community Development, Fire Department			



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associated with such facilities. SCAQMD Rule 1166 requirements include, but are not limited to, monitoring for VOCs during excavation and grading activities and, if VOC-contaminated soil is detected (i.e., soils with VOC concentrations of 50 parts per million (ppm) or more as measured at a distance of three inches), such materials must be reported, segregated, treated and/or removed from the project site within 30 days.						
<b>MM-HAZ-3:</b> PCB, Asbestos, and Lead-Based Paint Surveys. Prior to demolition or renovation of any on-site structures, a survey shall be performed to identify any Polychlorinated Biphenyls (PCBs), asbestos containing materials (ACM) and lead-based paint (LBP) within existing structures following U.S. Environmental Agency Guidance for Controlling Asbestos-Containing Materials in Buildings (1985) survey guidelines. If PCBs, ACM, and/or LBP are found, the compounds shall be removed or otherwise abated prior to demolition or renovation. Removal and abatement activities shall comply with all applicable laws, regulations, and rules established by federal, state, and local standards, including, but not limited to, those set forth by CalOSHA regulations, and SCAQMD regulations for the excavation, removal, and proper disposal of ACMs and LBP.	Construction Contractor	Survey: Prior to demolition or renovation Removal/Abatement: During demolition and renovation	Department of Planning and Community Development, Building & Safety Division			
<b>Noise and Vibration</b>						
<b>MM-NOISE-1:</b> Noise Activity Prohibition. Prior to the issuance of the hotel occupancy permit, the Applicant shall demonstrate to the satisfaction of the Director of Planning and Community Development that the hotel regulations include a prohibition on the use of radios, televisions, “boom boxes”, and similar devices in the pool area and other outdoor common areas unless the devices are used with headphones, ear buds, or similar devices.	Applicant	Prior to issuance of hotel occupancy permit	Department of Planning and Community Development			
<b>MM- NOISE-2:</b> Restriction of Nighttime Outdoor Activities. Prior to the issuance of the hotel occupancy permit, the Applicant shall demonstrate	Applicant	Prior to issuance of hotel	Department of Planning and Community			

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to the satisfaction of the Director of Planning and Community Development that the hotel regulations include a prohibition on the use of the pool area between 10:00 p.m. and 5:00 a.m. and that signs with pool hours are posted at the pool area.		occupancy permit	Development			
<b>MM- NOISE-3:</b> Loading Dock Design. All Project outdoor loading docks and trash collection areas will be located or constructed such that the line of sight between these noise sources and any adjacent noise sensitive land use would be obstructed to the extent necessary so as to reduce noise to within 5 dBA above ambient (in terms of hourly Leq) as measured at the nearest off-site noise sensitive receptor.	Applicant	Prior to issuance of building permits	Department of Planning and Community Development			
<b>MM- NOISE-4:</b> Access and Egress via Holliston for North and South Parcel. Prior to the issuance of an occupancy permits for Building A on the North Parcel and Building B on the South Parcel, the Applicant shall present data to the Director of Planning and Community Development consisting of signage, operating instructions, and other measures that would be implemented to:  1. Prevent service truck access and egress at the Holliston Avenue driveway and prevent use of the Holliston Avenue loading dock between 10:00 p.m. and 7:00 a.m. for the North Parcel; and prevent service truck access and egress on Giddings Alley at the Holliston Avenue driveway between 10:00 p.m. and 7:00 a.m. for the South Parcel.	Applicant	Prior to issuance of occupancy permits	Department of Planning and Community Development			
<b>MM-NOISE-5:</b> Interior Noise Level. Prior to the issuance of each building permit, the Applicant shall present data to the Director of Planning and Community Development demonstrating that the interior noise level of hotel rooms facing Colorado Boulevard or Hill Avenue shall not exceed 45 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL).	Applicant	Prior to issuance of building permits	Department of Planning and Community Development			
<b>MM- NOISE-6:</b> Vibration Monitoring of Historic Buildings. Prior to approval of grading plans and/or prior to issuance of demolition, grading and building	Applicant	Prior to approval of grading plans and/or prior to	Department of Planning and Community			

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<p>permits, the project proponent shall retain a Professional Structural Engineer with experience in structural vibration analysis and monitoring for historic buildings and a Project Historical Architect (PHA) as a team to perform the following tasks:</p> <ul style="list-style-type: none"> <li>• Review the project plans for demolition and construction.</li> <li>• Survey the project site and the historic buildings occupied by the F. Suie One Antiques Store and the new car showroom, including geological testing, if required.</li> <li>• Prepare and submit a report to the Director of Planning and Community Development that includes but is not limited to the following: <ul style="list-style-type: none"> <li>○ Any description/survey information obtained under the second bullet point.</li> <li>○ Any modifications to the vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure that vibration levels would remain below the potential for damage to the existing F. Suie One Antiques Store and the new car showroom.</li> <li>○ Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded.</li> <li>○ A monitoring plan to be implemented during demolition and construction that includes post-construction and post-demolition surveys of the existing F. Suie One Antiques Store and</li> </ul> </li> </ul>		issuance of demolition, grading and building permits	Development			

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<p>the new car showroom.</p> <p>Examples of measures that may be specified for implementation during demolition or construction include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• Prohibition of certain types of construction equipment.</li> <li>• The requirement for lighter-tracked or wheeled equipment.</li> <li>• Specifying demolition by non-impact methods, such as sawing concrete.</li> <li>• Organization of phasing so as to avoid simultaneous vibration sources.</li> <li>• Installation of vibration-measuring devices to guide decision making for subsequent activities.</li> </ul>						
<p><b>MM- NOISE-7:</b> Secretary of the Interior's Standards. At the conclusion of vibration-causing activities, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the F. Suie One Antiques Store and the new car showroom and shall recommend necessary repairs. The Applicant shall be responsible for any repairs associated with vibration caused damage. Repairs shall be undertaken and completed, as required, to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Code of Federal Regulations, Title 36, Section 68) and any other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8).</p>	Applicant	At the conclusion of vibration-causing activities.	Department of Planning and Community Development			
<p><b>MM- NOISE-8:</b> Vibration Notification. At least 5 days prior to the start of construction, the project proponent shall notify property owners of occupied buildings located within 25 feet of the project site boundary that perceptible levels of construction-related vibration may be experienced periodically during the course of project construction. The notification shall include a brief description of the</p>	Construction contractor	At least 5 days prior to the start of construction	Department of Planning and Community Development			

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types of construction equipment and activities that may produce such vibration, the estimated duration of such activities including the anticipated start dates and end dates, and a contact name and phone number to contact with any questions.						
<p><b>MM- NOISE-9:</b> Vibration Mitigation Plan for Holliston Avenue Methodist Church. Prior to approval of grading plans and/or prior to issuance of demolition, grading, and building permits for the North Parcel, the Project proponent shall provide a detailed vibration analysis prepared by a Professional Structural Engineer with experience in structural vibration analysis demonstrating that use of the vibratory compaction equipment at the Project boundary closest to the Holliston Avenue Methodist Church building would not result in damage to the structure or the stained glass window units. To ensure constant monitoring of project activities causing vibration, it may be advantageous to install ground vibration monitoring equipment at the Church throughout the construction of the Project.</p> <p>At the conclusion of vibration-causing activities, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the Holliston Avenue Methodist Church and shall recommend necessary repairs. The Applicant shall be responsible for any repairs associated with vibration caused damage. Repairs shall be undertaken and completed, as required, to conform to the Secretary of the Interior’s Guidelines for the Treatment of Historic Properties (Code of Federal Regulations, Title 36, Section 68) and any other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8).</p>	Applicant	Prior to approval of grading plans and/or prior to issuance of demolition, grading and building permits	Department of Planning and Community Development			
<p><b>MM- NOISE-10:</b> Vibration-Limiting Measure. Prior to approval of grading plans and/or prior to issuance of demolition, grading, and building permits for the North Parcel, the following vibration-limiting</p>	Construction contractor	Prior to approval of grading plans and/or prior to issuance of	Department of Planning and Community Development			

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<p>measure identified in the construction plans or specifications shall be provided:</p> <p>Vibratory rollers or similar vibratory compaction equipment shall not be used within 25 feet of the church complex buildings immediately adjacent to the North Parcel's northern boundary. Alternatively, the Applicant may provide a detailed vibration analysis prepared by a Professional Structural Engineer with experience in structural vibration analysis demonstrating that use of the vibratory compaction equipment at the project boundary closest to the adjacent church complex buildings would not result in a potential for structural damage. In the event this alternative means of satisfying the mitigation requirement is selected, the Applicant shall also include data and analysis confirming that the use of such equipment closer than 25 feet of the subject buildings will not result in construction-related vibration levels greater than 0.24 ppv in/sec at the building and, therefore, will not exceed the significance threshold for human annoyance for occupants therein.</p>		demolition, grading and building permits.				
<b>Traffic and Transportation</b>						
<p><b>MM-T-1: Proximity and Quality of Bicycle Network</b></p> <p>To mitigate the project's reduction of service population with access to Level 1 and Level 2 bicycle facilities, the applicant shall, prior to issuance of a grading permit, contribute its fair share of funds toward the Union Street Cycle Track Complete Streets Project found in the City's FY 2016 – 2020 Capital Improvement Program. The project's fair share contribution will be determined by multiplying the ratio of the service population of the project over the service population within a quarter mile of the Union Street Cycle Track with the total cost of the Union Street Cycle Track Complete Streets project, as follows:</p> <p><math>((\text{Proposed Project's Service Population})/(\text{Service Population within a 1/4 mile of the USCTCS})) \times (\text{Total</math></p>	Project Applicant and City of Pasadena Department of Transportation	Prior to issuance of grading permit	Department of Planning and Community Development, Building & Safety Division; Department of Transportation			

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Cost of the USCTCS)						