

**LOS ANGELES UNION STATION
FORECOURT AND ESPLANADE IMPROVEMENTS PROJECT**

MITIGATION MONITORING AND REPORTING PROGRAM

STATE CLEARINGHOUSE NUMBER 2016121064

PREPARED FOR:

**LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY
ONE GATEWAY PLAZA
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SECTION 1.0 INTRODUCTION

The California Environmental Quality Act (CEQA; Public Resources Code [PRC], Section 21000 et seq.) requires a Lead Agency or Responsible Agency that approves or carries out a project, where an Environmental Impact Report (EIR) has identified significant environmental effects, 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” (PRC, Section 21081.6 (a)(1)). The Los Angeles County Metropolitan Transportation Authority (Metro) is the Lead Agency for the Los Angeles Union Station Forecourt and Esplanade Improvements Project (project). A public agency shall “provide that measures to mitigate or avoid significant impacts to the environment are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents which address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other public project, by incorporating the mitigation measures into the plan, policy, regulation, or project design” (PRC, Section 21081.6 (b)).

1.1 PROJECT LOCATION

The project is located on approximately 6.7 acres in the City of Los Angeles, in the northern portion of the downtown area. The proposed project is located adjacent to and within Los Angeles Union Station (LAUS), at 800 North Alameda Street, City of Los Angeles, California 90012, in the U.S. Geological Survey Los Angeles 7.5-minute topographic quadrangle. The LAUS property is generally bounded by Highway 101 to the south, Alameda Street to the west, Cesar E. Chavez Avenue to the north, and Vignes Street to the east. However, the project site is generally bounded by El Pueblo Crosswalk on Los Angeles Street to the west, Cesar E. Chavez Avenue to the north, LAUS to the east, and Arcadia Street to the south. Specific project elements are located on Alameda Street from Arcadia Street in the south to Cesar E. Chavez Avenue in the north, Arcadia Street from Alameda Street to Spring Street, Los Angeles Street from El Pueblo de Los Angeles to LAUS, and the Union Station Forecourt area. Adjacent to the project to the west are the Chinese American Museum at 425 North Los Angeles Street, El Pueblo de Los Angeles State Historic Park at 125 Paseo De La Plaza, and the Avila Adobe Museum at 10 Olvera Street.

1.2 PROJECT GOAL AND OBJECTIVES

Metro is committed to improving passenger safety, improving connections, and accommodating existing and future destination and through-transit demands, including those who desire to utilize alternate forms of transit, rather than automobiles. Metro anticipates increased visitors and transit riders utilizing LAUS as the population grows. The project also supports local, regional, and state policies with regard to encouraging multi-modal travel. Most fundamentally, the need for the project is driven by safety and the need to better serve individuals who travel to LAUS to reach local neighborhoods and business, as well as those who travel to LAUS to make a connection to another mode of travel. Alameda Street, within the project boundaries, was identified in the City of Los Angeles Vision Zero, High Injury Network, a network of streets with higher rates of severe and fatal collisions. Additionally, the goal of the proposed project is to enhance connectivity to LAUS by creating a safer, more welcoming experience to transit riders and visitors to and from surrounding historic and culturally significant communities.

Metro identified seven primary requisite objectives for the project:

- Protect and enhance LAUS as a national historic resource by advancing clear sight lines and view sheds to the station.¹
- Prioritize connectivity, convenience, and safety for the most vulnerable users (pedestrians, bicyclists, transit patrons and community stakeholders) to safely navigate to and from the project site.^{2,3}
- Advance desirable and accessible public space at the LAUS forecourt that creates a visually porous and permeable connection between Union Station and the surrounding historic and cultural communities.⁴
- Facilitate alternatives to driving by providing infrastructure that enables more walking and bicycling.⁵
- Enhance the safety and quality of pedestrian and bicycle connections between the station and El Pueblo Historic Monument, Father Serra Park, Olvera Street, and nearby business and neighborhoods consistent with identified strategies.^{6,7}
- Advance sustainability by providing for reduced consumptive water use in a cost-effective manner⁸ and improving multi-modal facilities that encourage active transportation and reduction in vehicle miles traveled.⁹
- Advance comprehensive planning for LAUS that leverages it as the major regional transportation hub, a destination, and one of the city's foremost landmarks.¹⁰

¹ National Park Service. 1980. *National Register of Historic Places Inventory Nomination Form*. Available at: <https://npgallery.nps.gov/GetAsset?assetID=c72efa93-90ca-40ba-9ca6-ae3d3515cf37>

² City of Los Angeles Department of City Planning. 2016. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Accessed August 2, 2017.

³ Los Angeles County Metropolitan Transportation Authority. 2015. *Connect US Action Plan*. Available at: https://media.metro.net/projects_studies/union_station/images/LAUSMP_Action_Plan_Final_100515.pdf

⁴ County of Los Angeles Department of Public Health. November 2014. *The Plan for a Healthy Los Angeles*. Available at: http://publichealth.lacounty.gov/place/docs/FINAL_CTG%20HIGHLIGHTS%20Plan%20for%20Healthy%20LA_Nov%202014.pdf

⁵ Los Angeles County Metropolitan Transportation Authority. June 2012. *Climate Action and Adaptation Plan*. Prepared by ICF International. Available at: http://media.metro.net/projects_studies/sustainability/images/Climate_Action_Plan.pdf

⁶ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS.pdf>

⁷ City of Los Angeles. Accessed 8 July 2017. Vision Zero. Los Angeles 2015-2025. Available at: <http://visionzero.lacity.org/map/>

⁸ Los Angeles County Metropolitan Transportation Authority. June 2010. *Water Action Plan*. Prepared by ICF International and Brezak & Associates Planning. Available at: http://media.metro.net/projects_studies/sustainability/images/Water_Plan2010_0825.pdf.

⁹ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS.pdf>

¹⁰ City of Los Angeles Department of City Planning. 2016. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Policy 3.6, p. 88. Accessed August 2, 2017.

1.3 PROJECT ELEMENTS

Metro evaluated a proposed project, no-project (Alternative 1), and two action alternatives (Alternative 2 and 3). Metro has selected Alternative 3 for approval.

The project has the potential to immediately improve connectivity to the station and signify an immediate, positive change in perception of the station. Circulation and streetscape improvements to Alameda Street will further enhance the station's doorstep, easing traffic and pedestrian conflicts and offering an aesthetically pleasing journey to the station's front door.

The project will focus on perimeter improvements on the west side of Los Angeles Union Station to improve pedestrian safety, accessibility, and connectivity. It will consist of four general project components: the Alameda Esplanade Improvements, the Forecourt Improvements, the partial closure of Los Angeles Street, and the Arcadia Street El Pueblo tour bus parking. Improvements include:

1.3.1 Alameda Esplanade

Consistent with the Connect US Action Plan (formerly known as the Linkages Plan) and the Union Station Master Plan, Alameda Street is reconceived as a verdant, tree-lined, multi-use esplanade with wide walkways that support pedestrian and bike circulation to the station and along its frontage.

The new esplanade will run along Alameda Street (between Cesar E. Chavez Avenue and Arcadia) and will include narrowing the roadway and reallocating roadway area for the expanded pedestrian and bicyclist multi-use esplanade on the eastside and widened sidewalks on the west. The project would change three travel lanes in each direction to two lanes of travel with a left turn center lane/median and curb side drop-off on the east side of Alameda Street.

1.3.2 Los Angeles Crossing

The entrance from LAUS to the El Pueblo de Los Angeles State Historic Park will be reconfigured by creating a new expanded, raised pedestrian crossing that leads into a new pedestrian plaza that includes a two-way off-street bicycle path through the expanded El Pueblo plaza area near the west side of Los Angeles Street. The project provides additional pedestrian and bicycle connectivity through the partial closure of Los Angeles Street and closure of the northern LAUS driveway on Alameda Street.

1.3.3 Arcadia Street Improvements

The existing northernmost travel lane on Arcadia Street westbound between Alameda Street and Spring Street will be repurposed as a tourist bus parking zone designated for El Pueblo.

1.3.4 Forecourt Improvements

The forecourt improvements include removing the existing 60-space short-term parking northwest of the entrance to LAUS (approximately 60 spaces) to create a dynamic new civic plaza with an outdoor seating area that encourages pedestrian, bike, and transit use.

The forecourt also includes sustainability components and a seating area. Additionally, an approximately 10-foot-tall, 300-square-foot (20-foot by 15-foot) small transit-serving building will be constructed in the

northern end of the forecourt. Possible cladding materials include glazed or metal panel curtain wall systems, architectural pre-cast concrete, and terracotta or similar materials that conform to the Secretary of Interior Standards and Guidelines for Historic Properties. The building will be sheltered by an approximately 15-foot-high, 80-foot by 30-foot translucent shade structure. The building and shade element will provide amenities for pedestrians using the forecourt area.

1.3.5 Circulation

As a means to encourage transit ridership and create links to adjacent neighborhoods and the larger urban network of civic spaces, the Project will improve the pedestrian, cycling, and vehicular environment. This will include increasing site visibility, incorporating a multi-use bike path along Alameda Street, adding bike parking, increasing pedestrian crossings, and shifting vehicular drop-off/pick-up areas along Alameda Street.

Alternative 3

Alternative 3, the Restricted Left Hand Turns from Los Angeles alternative, would include many of the elements described in the project description but would not allow left hand turns onto Alameda Street from Los Angeles Street. This would mean that only right-hand turns (southbound) would be allowed onto Alameda Street, as well as through movements into Union Station from Los Angeles Street. This alternative would change traffic patterns because the eastbound left movement from eastbound Los Angeles Street to northbound Alameda Street would be prohibited. On Arcadia Street, the tour bus parking lane would be provided during off-peak hours only, with the lane being used by through-traffic during peak hours. This alternative keeps all other project improvements as described in the project description.

1.3.6 Landscaping

The project will create improved public spaces that will be framed by double row of sycamore or similar trees along Alameda in key areas to the west and a linear alignment of olive or similar trees planted along the reconfigured driveway parallel to the historic station to the east. Trees and landscape features planted in the public right of way will adhere to requirements of the City of Los Angeles Bureau of Street Services.

Relating back to the overall Union Station Master Plan Open Space and Landscape Concept, the ecological conditions along the western edge of the project, including the Alameda Esplanade, will be supported by the planting of sycamore or similar trees. The forecourt will include bioswales that will be designed to receive, convey, treat, detain, and release/infiltrate stormwater. To achieve the sustainability goals of the project, the swale may incorporate purple pipes for recycled water usage and drought tolerant landscaping.

1.3.7 Stormwater Runoff Management

In an effort to provide sustainable site systems, the drainage of the forecourt will support stormwater capture and reuse, increasing climate comfort while supporting on-site landscape and urban ecology. For sustainability, the project aims to have the majority of the ground surfaces as decomposed granite and other porous paving materials, including volcanic porphyry pavers and porous concrete, or other comparable materials, to promote a porous ground plane and enhance pedestrian circulation.

SECTION 2.0

MITIGATION MONITORING AND REPORTING PROGRAM

The mitigation monitoring and reporting program (MMRP) contained herein satisfies the requirements of the California Environmental Quality Act (CEQA) as they relate to the Environmental Impact Report (EIR) for the Los Angeles Union Station Forecourt and Esplanade Improvements Project (project). The Draft EIR, dated August 11, 2017, was circulated for a 45-day public review and comment period.

The EIR identifies mitigation measures that have been incorporated into the project to avoid, reduce, and mitigate significant impacts to biological resources, cultural resources, and hazards and hazardous materials. In addition, the EIR disclosed significant and unavoidable impacts to transportation and traffic, but no feasible mitigation measures were identified. This MMRP has been designed to ensure compliance with mitigation measures defined in the EIR during implementation of the project. This MMRP would be adopted by the Los Angeles County Metropolitan Transportation Authority (Metro) Board of Directors. Table 2-1, *Mitigation Monitoring and Reporting Program*, lists those mitigation measures required by the Board of Directors to mitigate or avoid significant impacts anticipated in association with the project.

Table 2-1 describes each required mitigation measure organized by impact area, with an accompanying delineation of the following:

- The period of the project during which implementation of the mitigation measure is to be monitored
- The responsible agency (the agency with the power to enforce the mitigation measure)
- The monitoring agency (the agency to whom the reports are made)

**TABLE 2-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Proposed Project Impacts	Mitigation Measures	When Monitoring Is to Occur	Responsible Agency	Monitoring Agency
Biological Resources				
<p>The proposed project would not result in impacts to biological resources in relation to movement of any migratory fish or wildlife species or with an established wildlife corridor. The proposed project would have the potential to result in impacts to biological resources in relation to impeding the use of native wildlife nursery sites.</p>	<p>MM-BIO-1: <i>Nesting Bird Avoidance</i>. Within one week (7 days) prior to the start of construction, ground disturbance, or vegetation trimming/removal activities and within nesting bird season, which occurs between February 1 and August 31, a qualified biologist shall conduct pre-construction nesting bird surveys to identify the presence of nesting birds protected by the Migratory Bird Treaty Act (MBTA), the Bald and Golden Eagle Protection Act, and the California and federal Endangered Species Acts. If nesting birds are encountered during the preconstruction nesting surveys, a 150-foot radius (from the center point of the tree location, i.e., a 300-foot diameter) disturbance-free buffer, pursuant to the MBTA, shall be established around each nest, and no activities shall be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. If for any reason an active bird nest must be removed during the nesting season, the applicant shall be required to obtain all necessary permits from the United States Fish and Wildlife Service and the California Department of Fish and Wildlife authorizing the nest relocation. Whenever feasible, removal of existing trees and ground disturbance, and/or vegetation removal/trimming activities within a 150-foot radius of trees with active nests shall take place outside of the nesting bird season.</p>	Pre-Construction and Construction	Metro	Metro
Cultural Resources				
<p>As designed, the elements of the proposed project comply with the Secretary of the Interior's Standards, and would not result in a substantial adverse change to this component of the historical resource pursuant to Section 15064.5(b) of the State CEQA Guidelines. The proposed project would have the potential to result in a significant impact to historical resources as defined in Section 15064.5(b) of the State CEQA Guidelines.</p>	<p>MM-CULTURAL-1: <i>Archaeological and Historical Resources – Avoidance and Monitoring</i>. Completion of a Worker Education and Awareness Program (WEAP) for all personnel who will be engaged in ground-disturbing activities shall be required prior to the start of ground-disturbing activities. This shall include training that provides an overview of cultural resources that might potentially be found and the appropriate procedures to follow if cultural resources are identified. This requirement extends to any new staff prior to engaging in ground disturbing activities.</p> <p>An environmental sensitive area shall be established through the use of construction fencing to minimize the potential for built environment resources to be damaged during construction activities.</p> <p>Metro shall require monitoring by a safety qualified archaeologist and Native American monitor of all ground-disturbing activities according to the protocols and guidelines of the project specific archaeological and paleontological monitoring program to ensure project safety.</p> <p>In the event that previously unknown unique archaeological resources, significant historical resources, or tribal cultural resources are encountered during construction, the resources shall either be left in situ and avoided; or the resources shall be salvaged, recorded, and repositied consistent with the provisions of a Phase III data recovery program consistent with the provisions of a Cultural Resources Management Plan. Data recovery is not required by law or regulation. It is, however, the most commonly agreed-upon measure to mitigate adverse effects to archaeological sites eligible or listed under Section 106 Criterion D, as it preserves important information that would otherwise be lost.</p>	Pre-Construction and Construction	Metro	Metro
	<p>MM-CULTURAL-2: <i>CRMP and Pre-Construction Testing</i>. Prior to construction, a Cultural Resource Management Plan (CRMP) will be prepared that will target areas within the archaeological APE most likely to contain buried cultural resources. Subsurface test excavation will be conducted to ensure that the Project will identify and evaluate significant archaeological resources. A research design and work plan will be focused on the physical identification of intact subsurface archaeological remains. Prior to construction, Phase II archaeological testing will be conducted in areas most likely to contain buried cultural resources in soils that have been predominantly <i>in situ</i></p>	Pre-Construction and Construction	Metro	Metro

**TABLE 2-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Proposed Project Impacts	Mitigation Measures	When Monitoring Is to Occur	Responsible Agency	Monitoring Agency
	<p>during the past 50 years within the boundaries of recorded unique archaeological resources, significant historical resources as defined in Section 15064.5(a) of the State CEQA Guidelines, or tribal cultural resources as defined in AB 52. If resources are discovered during Phase II testing prior to construction, they will be evaluated for significance with criteria set forth in the CRMP. If significant archaeological deposits are found during test excavations prior to construction, a mitigation plan will be developed to ensure that important archaeological data are not lost. The mitigation plan will include methods by which prehistoric, protohistoric, and historical archaeological deposits will be avoided or recovered prior to construction. If the testing determines no unique archaeological resources or significant historical resources, including potential tribal cultural resources, then the work shall proceed consistent with the provisions of MM-CULTURAL-1.</p> <p>Where the project site has been subject to testing within two years of the proposed activity and no unique archaeological resources, significant cultural resources, or tribal cultural resources are known from the project site, work shall proceed per the provision of Mitigation Measure CULTURAL-1.</p> <p>a. If the testing determines potential unique archaeological resources or significant historical resources, including potential tribal cultural resources, at a depth that will be affected by the ground-disturbing activities, one of two courses of action shall be employed:</p> <ol style="list-style-type: none"> 1. Where avoidance is feasible, the ground disturbance shall be modified to avoid the potentially significant resource, and the work shall then proceed consistent with the provisions of MM-CULTURAL-1. An archaeological monitor shall be present during ground-disturbing activities. In addition, consultation shall be undertaken with the local Native American Tribal contacts designated by the NAHC to determine if a Native American monitor shall also be present during all or a portion of the ground-disturbing activities. 2. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible cultural resource within the area proposed for ground-disturbing work, Metro shall determine whether to avoid the resource through redesign or proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of MM-CULTURAL-1. 			
<p>The proposed project would have the potential to result in significant impact on archaeological resources as defined in Section 15064.5(b) of the State CEQA Guidelines.</p>	<p>MM-CULTURAL-1 and MM-CULTURAL-2</p>	<p>Pre-Construction and Construction</p>	<p>Metro</p>	<p>Metro</p>
<p>The proposed project would have the potential to result in significant impacts to paleontological resources as defined in Section 15064.5(b) of the CEQA Guidelines.</p>	<p>MM-CULTURAL-3: <i>Paleontological Resources – Paleontological Monitoring</i>. Impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located 6 or 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, work stops, an assessment of the site is conducted. No work shall proceed within immediate vicinity until the salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology is completed. At the time that work is continued to be authorized, Metro shall require and be responsible for salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology.</p>	<p>Pre-Construction and Construction</p>	<p>Metro</p>	<p>Metro</p>

**TABLE 2-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Proposed Project Impacts	Mitigation Measures	When Monitoring Is to Occur	Responsible Agency	Monitoring Agency
	<p>Paleontological Resource Sensitivity Training shall be required for all project personnel 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 shall extend to any new staff joining the project.</p> <p>Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed geologic units 6 feet or more 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 removing and stabilizing the specimen. Curation of the any significant paleontological finds shall be required with a qualified repository, such as the Natural History Museum of Los Angeles County.</p> <p>Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to Metro with an appended, itemized inventory of specimens. The report and inventory, when submitted to Metro, shall signify the completion of the program to mitigate impacts to paleontological resources.</p>			
<p>The proposed project would have the potential to result in significant impacts to human remains as defined in Section 15064.5(b) of the CEQA Guidelines.</p>	<p><i>MM-CULTURAL-4: Regulatory Requirements – Human Remains.</i> 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 shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains.</p> <p>If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the NAHC in Sacramento within 24 hours. In accordance with Section 5097.98 of the California PRC, the NAHC shall immediately notify the person(s) it believes to be the Most Likely Descendant 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 Metro, the disposition of the human remains. The Most Likely Descendant’s recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If Metro rejects the Most Likely Descendant’s recommendations, the agency shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (14 California Code of Regulations §15064.5(e)).</p>	<p>Construction</p>	<p>Metro</p>	<p>Metro</p>
<p>The proposed project would have the potential to result in significant impacts to tribal resources as defined in Section 15064.5(b) of the State CEQA Guidelines.</p>	<p>MM-CULTURAL-1 and MM-CULTURAL-2</p>	<p>Pre-Construction and Construction</p>	<p>Metro</p>	<p>Metro</p>

**TABLE 2-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Proposed Project Impacts	Mitigation Measures	When Monitoring Is to Occur	Responsible Agency	Monitoring Agency
<p>Hazards and Hazardous Materials</p> <p>The proposed project has the potential to result in significant Impacts to hazards and hazardous materials during construction in relation to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. There would less than significant operational impacts to hazards and hazardous materials related to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p>	<p>MM-HAZ-1: If soil in the vicinity of the former railroad tracks alignment along Alameda Street and the rail spurs into the Forecourt parking area is planned for excavation and off-site disposal as part of the proposed Project improvements, soil shall be sampled and analyzed for the potential presence of petroleum hydrocarbons, metals and persistent pesticides. The samples should be analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), CCR Title 22 Metals, and organochlorine pesticides (OCPs) using United States EPA Methods 8015B(M), 8260B, 6010B/7471A, and 8081, respectively. This methodology should be documented in a Soil Management Plan prior to construction. During construction, soil excavations conducted on site shall be monitored for visible soil staining and odor. Impacted soils shall be disposed off site in accordance with pertinent local, state, and federal regulatory guidelines.</p>	Pre-Construction and Construction	Metro	Metro
	<p>MM-HAZ-2: If soil in the vicinity of the former gasoline station is planned for excavation and off-site disposal as part of the proposed Project improvements, soil sampling shall be performed along the west side of Alameda Street within the Project area, in the vicinity of the former gasoline station. Soil samples should be analyzed for the presence of TPH, VOCs, and lead using United States S EPA Methods 8015B(M), 8260B, and 6010B, respectively. Prior to construction, a Soil Management Plan should be prepared. During construction, soil excavations conducted on site shall be monitored for visible soil staining and odor. Impacted soils shall be disposed off site in accordance with pertinent local, state, and federal regulatory guidelines.</p>	Pre-Construction and Construction	Metro	Metro
	<p>MM-HAZ-3: If yellow traffic markings are removed separately from the adjacent pavement, the markings shall be removed and sampled for lead chromate prior to construction, consistent with the current Caltrans' Standard Special Provisions (SSP).</p>	Pre-Construction	Metro	Metro
	<p>MM-HAZ-4: Should evidence of naturally-occurring oil seeps within the Project area, or impacted soil from a crude oil pipeline beneath Alameda Street be observed, the Caltrans Unknown Hazard Procedures shall be implemented during construction activities.</p>	Construction	Metro	Metro
<p>The construction of the proposed project would have the potential to result in significant impacts to hazards and hazardous materials with respect to the emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There would be less than significant operational impacts to hazards and hazardous materials related to exposing schools to hazardous emission as a result of operation or maintenance of the proposed improvements.</p>	MM-HAZ-1 through MM-HAZ-4	Pre-Construction and Construction	Metro	Metro