

**DRAFT
MITIGATION MONITORING & REPORTING
PROGRAM
FINAL ENVIRONMENTAL IMPACT REPORT
SCH# 2016091024**

**CITADEL OUTLETS EXPANSION & 10-ACRE
DEVELOPMENT PROJECT
COMMERCE, CALIFORNIA**



LEAD AGENCY:

**CITY OF COMMERCE
PUBLIC WORKS AND DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION
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JUNE 24, 2019

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1. PROJECT OVERVIEW

The City of Commerce Public Works and Development Services Department (also referred to hereinafter as the *Lead Agency*) is reviewing a proposal that would permit the expansion of the Citadel shopping center and a 10-Acre development site. The project Applicant is Citadel Holdings Group, LLC, 4100 MacArthur Boulevard, Suite #100, Newport Beach, California 92660, and the Wash-Tel Commerce, LLC, 4100 MacArthur Boulevard, Suite #100, Newport Beach, California 92660.

The planning area is located along the northerly side of Telegraph Road between Hoefner Avenue (on the west) and continuing east to Washington Boulevard. The land occupied by the existing industrial uses located to the west of Tubeway Avenue and the Commerce Casino and Hotel is not part of the proposed project. The proposed project would involve the development of a number of underutilized properties with new retail uses, new hotels, entertainment uses, offices, and other uses.

2. MITIGATION MONITORING & REPORTING PROGRAM

Section 21081(a) of the Public Resources Code states that findings must be adopted by the decision-makers coincidental to the approval of an Environmental Impact Report. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the following additional findings may be made:

- A mitigation reporting or monitoring program will be required;
- Site plans and/or building plans, submitted for approval by the responsible monitoring agency, shall include the required standard conditions; and,
- An accountable enforcement agency or monitoring agency shall be identified for the mitigations adopted as part of the decision-maker's final determination.

3. MITIGATION MEASURES

The following mitigation is required to address potential negative impacts during demolition, grading, and construction phases.

Mitigation Measure 1 (Scenic & Visual Impacts). Prior to demolition activities, the project applicant shall erect a temporary construction barrier along public street frontages that adjoin the Areas 2 and 3 along Washington Boulevard and Telegraph Road. The barrier shall consist of material (wood, fabric, vinyl, etc.) that screens off-site views of the project site from the public right-of-way. The screen wall must also employ graffiti-resistant materials/properties. The barrier shall remain in place until building construction activities complete.

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To further reduce the potential for spill-over lighting and glare, the following mitigation will be required:

Mitigation Measure 2 (Light & Glare Impacts). The Applicant must also submit an exterior lighting plan for review and approval by the Public Works and Development Services Department prior to the issuance of building permits.

Mitigation Measure 3 (Light & Glare Impacts). The three new LED digital signs proposed for Area 2 must not include flashing, intermittent or moving lights, and must not emit light that may obstruct or impair the vision of any driver. The LED signs must be designed to freeze the display in one static position, display a full black screen, or turn off, in the event of a malfunction. The proposed displays (all levels) must be fully dimmable, and must be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day. Finally, the LED signs will be prohibited from displaying any red, blinking, or intermittent light likely to be mistaken for warning or danger signals.

Mitigation Measure 4 (Light & Glare Impacts). All buildings, parking structures, and signage within the project areas must be prohibited from using highly reflective building materials such as mirrored glass in exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass.

The following mitigation would be required to further reduce air emissions.

Mitigation Measure 5 (Air Quality Impacts). The project Applicant; retail, restaurant, and hotel management and office building management must provide incentives to encourage employees to utilize alternative transportation such as reduced rate transit passes, employee carpooling and vanpooling services, and preferential parking for carpool vehicles.

Mitigation Measure 6 (Air Quality Impacts). The building contractors must install electric vehicle (EV) charging stations in the parking garages. The number and location of the EV stations will be determined by the City in subsequent phases of design review and plan check. Preferential parking spaces for electric vehicles must be provided in every Area.

Mitigation Measure 7 (Air Quality Impacts). Multiple shuttles powered by alternative fuels must be provided in the absence of the monorail. Once the monorail is complete and running, use of the shuttles may be discontinued. The use of the shuttles will discourage future patrons and guests from using their personal vehicle from travelling to different Areas of the project.

Mitigation Measure 8 (Air Quality Impacts). Kiosks and directories depicting mass transit times and routes, the locations of bicycle racks, and the locations and times of the shuttles must be placed in visible locations within each project area.

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Mitigation Measure 9 (Air Quality Impacts/Environmental Justice). The project Applicant must host a job fair with advertising prior to the project's opening to attract and hire local residents. In addition, preferential hiring must be given for Commerce residents. By hiring future employees from the City, the Applicant will reduce the number and distance of employee home-to-work trips.

The SCAQMD following their review of the Draft EIR indicated that even though the proposed project's construction and operational emissions would exceed thresholds, the following additional mitigation measures were warranted. If the Lead Agency finds, after revising the air quality analysis based on SCAQMD staff's comments that the project would result in significant air quality impacts, particularly from NO_x and PM_{2.5} emissions, mitigation measures are required. To assist the identification of feasible mitigation measures that are capable of reducing construction emissions from NO_x and particulate matter, the SCAQMD recommended that the Lead Agency incorporate the following mitigation measures in the Final EIR.

SCAQMD Mitigation Measure a. Require construction contractor(s) to use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (U.S. EPA) Tier 4 offroad emissions standards for equipment rated at 50 horsepower or greater during construction.

SCAQMD Mitigation Measure b. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NO_x emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NO_x emissions or newer, cleaner trucks.

SCAQMD Mitigation Measure c. Require that the proposed project's tenants maintain records of all trucks visiting the project and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the project meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.

SCAQMD Mitigation Measure d. Maintain vehicle and equipment maintenance records for the construction portion of the project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. All maintenance records shall remain on-site for a period of at least two years from completion of construction.

SCAQMD Mitigation Measure e. Enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 – CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle

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that is expected to idle longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. To further ensure that drivers understand the vehicle idling requirement, post signs at the entrance and throughout the site stating that idling longer than five minutes is not permitted.

SCAQMD Mitigation Measure f. Encourage construction contractors to apply for SCAQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. Since the project would result in significant and unavoidable air quality impacts during operation, and in addition to Mitigation Measures (Air Quality) 5 through 9, the SCAQMD staff recommended that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce the proposed project's operational air quality impacts.

SCAQMD Mitigation Measure g. Require at least 5% of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.

SCAQMD Mitigation Measure h. Provide incentives for vendors and material delivery trucks that would be visiting the hotel and commercial uses to encourage the use of zero-emission or near-zero emission heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize the use of 2010 model year10 or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.

SCAQMD Mitigation Measure i. Implement an anti-idling program. Vendors should be instructed to advise drivers that trucks and other equipment shall not be left idling for more than five minutes. Signs informing truck drivers of the anti-idling policy should be posted in the loading docks of the Proposed Project.

SCAQMD Mitigation Measure j. Establish a policy to select and use vendors that use clean vehicles and trucks to service and deliver materials. Include this policy in the vendor contracts and business agreement.

SCAQMD Mitigation Measure k. Maximize the planting of trees in landscaping and parking lots.

SCAQMD Mitigation Measure l. Require use of electric or alternatively fueled street-sweepers with HEPA filters.

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SCAQMD Mitigation Measure m. Require use of electric lawn mowers and leaf blowers.

The following mitigation measure will be required to address potentially significant impacts.

Mitigation Measure 10 (Cultural Resources Impacts). The project Applicant will be required to obtain the services of a qualified Native American Monitor during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians, Kizh Nation as activities that include, but are not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, and trenching, within the project area. The monitor(s) must be approved by the tribal representatives and the City's Development Services Director and will be present on-site during the construction phases that involve any ground disturbing activities. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archeological resources.

The proposed project will be required to comply with the Green Building Code requirements which will result in a reduction in GHG generation associated with water consumption, waste generation, and traffic. A number of comments on the Draft EIR indicated that the Final EIR should include mitigation measures that would be effective at reducing potential GHG emissions.

GHG Mitigation Measure a. The Citadel owners shall provide incentives to encourage employees to utilize alternative transportation such as reduced public transportation fares, employee carpooling and vanpooling services, and preferential parking for carpool and vanpool vehicles.

GHG Mitigation Measure b. The Gold Line extension will allow Citadel patrons to utilize the transit to travel to the project, thus reducing vehicle trips.

GHG Mitigation Measure c. If the option that involves the extension of the Gold Line through Commerce is pursued, the project Applicant shall provide a shuttle service to transport Citadel patrons to the Gold Line station from the project.

GHG Mitigation Measure d. The building contractors shall install electric vehicle charging stations in the parking areas.

GHG Mitigation Measure e. The Citadel owners must facilitate handicapped access onto the monorail. The monorail station must be designed to provide comfort and promote efficiency in passenger transport and consumption of fuel.

GHG Mitigation Measure f. The Citadel owners must schedule a meeting with representatives of the Los Angeles Metro (LA Metro) and the City of Commerce Public Works and Development Services Department to improve the bus stops that serve the project area. Improvements such as installing shaded benches, increasing bus frequency, and making improvements to security will ensure reliable transit ridership. Furthermore, such improvements may increase transit ridership.

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Implementation of the following mitigation measures will reduce the proposed project's emission of hazardous materials.

Mitigation Measure 11 (Hazards & Hazardous Materials). The preparation of a soil and demolition management plan (SMP) will be required. Grading and development should plan for removal of USTs, other subsurface features not removed during demolition, and potential management of visually impacted soil. Observation of grading and demolition operations under the SMP must be conducted.

Mitigation Measure 12 (Hazards & Hazardous Materials). The railroad spur line is likely impacted by petroleum hydrocarbons, arsenic, lead, and polynuclear aromatic hydrocarbons. When the line is removed, and if the soil is excavated and moved from the property, the soil will likely require sampling and special handling.

Mitigation Measure 13 (Hazards & Hazardous Materials). A vapor barrier must be installed at 2240 Gaspar Avenue should a building be constructed within the property (Area 2).

Mitigation Measure 14 (Hazards & Hazardous Materials). An Operations and Maintenance (O&M) Program must be implemented in order to safely manage the suspect ACMs and LBP located in the remaining buildings.

The Traffic Impact Analysis included various TDM, TSM, and project-specific design measures which include the following:

- *Transportation Information Center.* A Transportation Information Center is a centrally located commuter information center where project employees, tenants, and patrons can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A Transportation Information Center would support orientation for new employees and provide information about transit schedules, commute planning, rideshare, telecommuting, and bicycle and pedestrian plans.
- *Educational Programs.* A key component of a successful TDM program is to make employers and employees at the project site aware of the various programs offered. To this end, a transportation management coordinator (TMC) on the building management staff could reach out both to employers and employees directly to promote the benefits of TDM. In addition to the various TDM programs described below, the TMC could reach out to employers to promote flexible or alternative work schedules and telecommuting options with statistics and examples of businesses that have successfully implemented such programs. These programs have the ability to reduce peak hour trip generation by allowing employees to arrive for and leave from work outside of the typical morning and afternoon peak commuting hours.

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- ***Project Design Features to Promote Bicycling and Walking.*** A significant and growing number of people in the City prefer to ride bicycles or walk to their employment given sufficient facilities to make the commute feel safe and convenient. The project could incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, or a bicycle sharing or rental program. Additionally, the project site could be designed to be a friendly and convenient environment for pedestrians. As part of an overall Public Benefits Program, the project could contribute a one-time fixed fee to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the area.
- ***Online Ridematching and Carpool/Vanpool Program.*** The TMC could provide a ridematching service to match interested employees with carpools and vanpools. Carpools/vanpools provide the potential for employees to come to work relaxed and/or work during the commute and reduce the number of vehicle trips to and from the Planning Area.
- ***Guaranteed Ride Home (GRH).*** A GRH program assures transportation service to individuals who commute without their personal automobiles. This program overcomes one of the primary concerns regarding alternative modes of transportation, which is how to get home or to a child's school in the case of an emergency. A GRH program would cover all employees participating in the carpool/vanpool program or using transit to and from the Planning Area in the event of personal or family emergencies. The individual would be reimbursed for a taxi ride, shared car service, or short-term car rental. Typically, this GRH benefit is limited to two-three times per year per employee to avoid abuses of the benefit. A support service such as GRH is an important part of TDM implementation that assures an individual he or she will not be dependent on a ridesharing or transit schedule in the event of an emergency.
- ***Short-Term Car Rentals.*** The project could partner with short-term car rental services such as Zip-Car or Car-to-Go, which would provide vehicles available to users for hourly rentals at strategic locations within the City area. Similar to the GRH program, this service offers assurance to users of alternative modes of transit that they have options should the need arise to leave at an unscheduled time. Short-term car rentals could be used to travel to business meetings, lunch, or in emergencies, and could provide the source of emergency transportation for those using the GRH program.
- ***Incentives for Using Alternative Travel Modes.*** The project TMC could incorporate various incentives for use of its programs. For example, eligible employees could be provided with discounted monthly transit passes for Metro rail and bus service. Carpool and vanpool users could be offered preferential load/unload areas or convenient designated parking spaces. Those who choose not to drive their own cars and park them at the project site could receive a "parking cash-out" subsidy.
- ***Mobility Hub Support.*** The project could support efforts to provide first-mile and last-mile service for transit users through the mobility hub program. Mobility hubs, typically located at or near public transit centers, provide amenities such as bicycle parking and rentals, shared vehicle rentals

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(e.g., Zip-Car), and transit information. The project could provide space for similar amenities at the project site to complement future mobility hubs in the Study Area.

Potential TSM improvements include the following:

- ***Signal Controller Upgrades.*** Many study intersections within the City currently operate with the Type 170 signal controller while newer controllers (Type 2070) provide for enhanced and real-time operation of traffic signal timing. The City recommends traffic signal controller upgrades to a Type 2070 Controller, as well as 322 cabinets to replace the existing aging cabinets. These improvements would provide system-wide benefits.
- ***CCTV Cameras.*** The potential TSM improvements include funding for the installation of CCTV cameras and the necessary infrastructure (including fiber optic and interconnect tubes). An integral part of the real-time operation of the traffic signal timings, the strategic placement of CCTV cameras at key intersections provides the City with the ability to monitor traffic operations and respond instantly to incidents that delay vehicles and transit service.
- ***System Loops.*** The potential TSM improvements include funding the installation of system loops at signalized intersections within the identified corridors. A system loop is an advance detector loop that is embedded in the street pavement. These loops identify traffic volume and lane occupancy and are used to determine the appropriate signal timing parameters. These loops give the City the ability to extend the green time for an approach so that groups of vehicles generally do not have to stop when travelling along synchronized-signal corridors. They are located at an appropriate distance from the intersection so that a vehicle just upstream of the loop can comfortably decelerate to a stop when the yellow signal is displayed.

The following is a description of the feasible proposed intersection mitigation measures:

- ***Intersection 11. Atlantic Boulevard & Telegraph Road.*** Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Atlantic Boulevard to provide an exclusive northbound right-turn lane. The resulting northbound approach would consist of two left-turn lanes, one shared left/right-turn lane, and one right-turn lane. This improvement could be accommodated within the existing right-of-way since the City owns the land on the east side of Atlantic Boulevard north of the freeway overpass. The improvement would require widening and reconstruction along the east side of the northbound leg from the north end of the bridge over I-5 to Telegraph Road. Due to the geometric limitations and the financial infeasibility of widening the bridge over I-5, the resulting northbound right-turn lane would be approximately 100 feet long, but it would provide some relief to intersection operations. *Should this improvement be determined infeasible during the design process, the impact at the intersection would remain and be considered significant*

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and unavoidable. A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.

- *Intersection 12. I-5 Northbound Ramps/Camfield Avenue & Telegraph Road.* Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Telegraph Road to provide an additional eastbound through lane. This improvement cannot be completed under the existing right-of-way and would require additional widening. The resulting eastbound approach would consist of one left-turn lane, two through lanes, and one shared through/right-turn lane. *Should this improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant and unavoidable.* A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.
- *Intersection 17. I-5 Ramps/Commerce Casino & Telegraph Road.* Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Telegraph Road to provide an additional westbound left-turn lane to the I-5 Northbound On-Ramp. This improvement cannot be completed under the existing right-of-way and would require additional widening along the north side of Telegraph Road. The resulting westbound approach would consist of two left-turn lanes, two through lanes and one through/right-turn lane. In order to accept the dual left-turn lanes, the freeway on-ramp would also have to be widened and ramp meters would have to be installed to meter the traffic onto the freeway. This intersection improvement would have to be approved by both the City and by Caltrans. *Should this improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant and unavoidable.* A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.

Under Future with Truck Traffic with Project Conditions (Year 2025), additional physical improvement measures are required at the following intersection:

- *Intersection 18. Washington Boulevard & Telegraph Road.* Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Washington Boulevard to provide an exclusive northbound right-turn lane onto Telegraph Road. This improvement cannot be completed under the existing right-of-way and would require additional widening along the east side of Washington Boulevard, south of Telegraph Road. The resulting northbound approach would consist of two left-turn lanes, two

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through lanes and one right-turn lane. *Should this improvement be determined to be infeasible during the design process, the impact at the intersection would remain and be considered significant and unavoidable.* A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.

4. MITIGATION MONITORING

The monitoring and reporting on the implementation of these measures, including the period for implementation, monitoring agency, and the monitoring action, are identified in Table 4-1 provided below.

TABLE 4-1 MITIGATION-MONITORING PROGRAM			
Measure	Enforcement Agency	Monitoring Phase	Verification
Mitigation Measure 1 (Scenic & Visual Impacts). Prior to demolition activities, the project applicant shall erect a temporary construction barrier along public street frontages that adjoin the Areas 2 and 3 along Washington Boulevard and Telegraph Road. The barrier shall consist of material (wood, fabric, vinyl, etc.) that screens off-site views of the project site from the public right-of-way. The screen wall must also employ graffiti-resistant materials/properties. The barrier shall remain in place until building construction activities complete.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date: Name & Title:
Mitigation Measure 2 (Light & Glare Impacts). The Applicant must also submit an exterior lighting plan for review and approval by the Public Works and Development Services Department prior to the issuance of building permits.	Public Works Department and Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date: Name & Title:
Mitigation Measure 3 (Light & Glare Impacts). The three new LED digital signs proposed for Area 2 must not include flashing, intermittent or moving lights, and must not emit light that may obstruct or impair the vision of any driver. The LED signs must be designed to freeze the display in one static position, display a full black screen, or turn off, in the event of a malfunction. The proposed displays (all levels) must be fully dimmable, and must be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day. Finally, the LED signs will be prohibited from displaying any red, blinking, or intermittent light likely to be mistaken for warning or danger signals.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date: Name & Title:
Mitigation Measure 4 (Light & Glare Impacts). All buildings, parking structures, and signage within the project areas must be prohibited from using highly reflective building materials such as mirrored glass in exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date: Name & Title:

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TABLE 4-1
MITIGATION-MONITORING PROGRAM

Measure	Enforcement Agency	Monitoring Phase	Verification
Mitigation Measure 5 (Air Quality Impacts). The project Applicant; retail, restaurant, and hotel management and office building management must provide incentives to encourage employees to utilize alternative transportation such as reduced rate transit passes, employee carpooling and vanpooling services, and preferential parking for carpool vehicles.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
Mitigation Measure 6 (Air Quality Impacts). The building contractors must install electric vehicle (EV) charging stations in the parking garages. The number and location of the EV stations will be determined by the City in subsequent phases of design review and plan check. Preferential parking spaces for electric vehicles must be provided in every Area.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
Mitigation Measure 7 (Air Quality Impacts). Multiple shuttles powered by alternative fuels must be provided in the absence of the monorail. Once the monorail is complete and running, use of the shuttles may be discontinued. The use of the shuttles will discourage future patrons and guests from using their personal vehicle from travelling to different Areas of the project.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
Mitigation Measure 8 (Air Quality Impacts). Kiosks and directories depicting mass transit times and routes, the locations of bicycle racks, and the locations and times of the shuttles must be placed in visible locations within each project area.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
Mitigation Measure 9 (Air Quality Impacts/Environmental Justice). The project Applicant must host a job fair with advertising prior to the project's opening to attract and hire local residents. In addition, preferential hiring must be given for Commerce residents. By hiring future employees from the City, the Applicant will reduce the number and distance of employee home-to-work trips.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
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TABLE 4-1
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Measure	Enforcement Agency	Monitoring Phase	Verification
SCAQMD Mitigation Measure b. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
SCAQMD Mitigation Measure c. Require that the proposed project's tenants maintain records of all trucks visiting the project and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the project meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
SCAQMD Mitigation Measure d. Maintain vehicle and equipment maintenance records for the construction portion of the project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. All maintenance records shall remain on-site for a period of at least two years from completion of construction.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
SCAQMD Mitigation Measure e. Enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 – CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle that is expected to idle longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. To further ensure that drivers understand the vehicle idling requirement, post signs at the entrance and throughout the site stating that idling longer than five minutes is not permitted.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
SCAQMD Mitigation Measure f. Encourage construction contractors to apply for SCAQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:

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SCAQMD Mitigation Measure g. Require at least 5% of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
SCAQMD Mitigation Measure h. Provide incentives for vendors and material delivery trucks that would be visiting the hotel and commercial uses to encourage the use of zero-emission or near-zero emission heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize the use of 2010 model year10 or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
SCAQMD Mitigation Measure i. Implement an anti-idling program. Vendors should be instructed to advise drivers that trucks and other equipment shall not be left idling for more than five minutes. Signs informing truck drivers of the anti-idling policy should be posted in the loading docks of the Proposed Project.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
SCAQMD Mitigation Measure j. Establish a policy to select and use vendors that use clean vehicles and trucks to service and deliver materials. Include this policy in the vendor contracts and business agreement.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
SCAQMD Mitigation Measure k. Maximize the planting of trees in landscaping and parking lots.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
SCAQMD Mitigation Measure l. Require use of electric or alternatively fueled street-sweepers with HEPA filters.	Development Services Department • (Applicant is responsible for implementation)	Over the project's operational lifetime. • Mitigation to continue over the project's lifetime.	Date: Name & Title:

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Measure	Enforcement Agency	Monitoring Phase	Verification
SCAQMD Mitigation Measure m. Require use of electric lawn mowers and leaf blowers.	Development Services Department • (Applicant is responsible for implementation)	<i>Over the project's operational lifetime.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:
Mitigation Measure 10 (Cultural Resources Impacts). The project Applicant will be required to obtain the services of a qualified Native American Monitor during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians, Kizh Nation as activities that include, but are not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, and trenching, within the project area. The monitor(s) must be approved by the tribal representatives and the City's Development Services Director and will be present on-site during the construction phases that involve any ground disturbing activities. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archeological resources.	Development Services Department • (Applicant is responsible for implementation)	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed or when the Native American Monitor has indicated that there is a low potential for encountering tribal cultural resources.	Date: Name & Title:
GHG Mitigation Measure a. The Citadel owners shall provide incentives to encourage employees to utilize alternative transportation such as reduced public transportation fares, employee carpooling and vanpooling services, and preferential parking for carpool and vanpool vehicles.	Development Services Department • (Applicant is responsible for implementation)	<i>Over the project's operational lifetime.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:
GHG Mitigation Measure b. The Gold Line extension will allow Citadel patrons to utilize the transit to travel to the project, thus reducing vehicle trips.	Development Services Department • (Applicant is responsible for implementation)	<i>Over the project's operational lifetime.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:
GHG Mitigation Measure c. If the option that involves the extension of the Gold Line through Commerce is pursued, the project Applicant shall provide a shuttle service to transport Citadel patrons to the Gold Line station from the project.	Development Services Department • (Applicant is responsible for implementation)	<i>Over the project's operational lifetime.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:

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GHG Mitigation Measure d. The building contractors shall install electric vehicle charging stations in the parking areas.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
GHG Mitigation Measure e. The Citadel owners must facilitate handicapped access onto the monorail. The monorail station must be designed to provide comfort and promote efficiency in passenger transport and consumption of fuel.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
GHG Mitigation Measure f. The Citadel owners must schedule a meeting with representatives of the Los Angeles Metro (LA Metro) and the City of Commerce Public Works and Development Services Department to improve the bus stops that serve the project area. Improvements such as installing shaded benches, increasing bus frequency, and making improvements to security will ensure reliable transit ridership. Furthermore, such improvements may increase transit ridership.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
Mitigation Measure 11 (Hazards & Hazardous Materials). The preparation of a soil and demolition management plan (SMP) will be required. Grading and development should plan for removal of USTs, other subsurface features not removed during demolition, and potential management of visually impacted soil. Observation of grading and demolition operations under the SMP must be conducted.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of any building or grading permits. • Mitigation ends when construction is completed.	Date: Name & Title:
Mitigation Measure 12 (Hazards & Hazardous Materials). The railroad spur line is likely impacted by petroleum hydrocarbons, arsenic, lead, and polynuclear aromatic hydrocarbons. When the line is removed, and if the soil is excavated and moved from the property, the soil will likely require sampling and special handling.	Development Services Department • (Applicant is responsible for implementation)	During the project's construction phase. • Mitigation ends when construction is completed.	Date: Name & Title:
Mitigation Measure 13 (Hazards & Hazardous Materials). A vapor barrier must be installed at 2240 Gaspar Avenue should a building be constructed within the property (Area 2).	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:

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Mitigation Measure 14 (Hazards & Hazardous Materials). An Operations and Maintenance (O&M) Program must be implemented in order to safely manage the suspect ACMs and LBP located in the remaining buildings.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.	Date: Name & Title:
TDM Program. Transportation Information Center. A Transportation Information Center is a centrally located commuter information center where project employees, tenants, and patrons can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A Transportation Information Center would support orientation for new employees and provide information about transit schedules, commute planning, rideshare, telecommuting, and bicycle and pedestrian plans.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of a certificate of occupancy.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:
TDM Program. Educational Programs. A key component of a successful TDM program is to make employers and employees at the project site aware of the various programs offered. To this end, a transportation management coordinator (TMC) on the building management staff could reach out both to employers and employees directly to promote the benefits of TDM. In addition to the various TDM programs described below, the TMC could reach out to employers to promote flexible or alternative work schedules and telecommuting options with statistics and examples of businesses that have successfully implemented such programs. These programs have the ability to reduce peak hour trip generation by allowing employees to arrive for and leave from work outside of the typical morning and afternoon peak commuting hours.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of a certificate of occupancy.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:
TDM Program. Project Design Features to Promote Bicycling and Walking. A significant and growing number of people in the City prefer to ride bicycles or walk to their employment given sufficient facilities to make the commute feel safe and convenient. The project could incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, or a bicycle sharing or rental program. Additionally, the project site could be designed to be a friendly and convenient environment for pedestrians. As part of an overall Public Benefits Program, the project could contribute a one-time fixed fee to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the area.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of a certificate of occupancy.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:

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TDM Program. Online Ridematching and Carpool/Vanpool Program. The TMC could provide a ridematching service to match interested employees with carpools and vanpools. Carpools/vanpools provide the potential for employees to come to work relaxed and/or work during the commute and reduce the number of vehicle trips to and from the Planning Area.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
TDM Program. Guaranteed Ride Home (GRH). A GRH program assures transportation service to individuals who commute without their personal automobiles. This program overcomes one of the primary concerns regarding alternative modes of transportation, which is how to get home or to a child's school in the case of an emergency. A GRH program would cover all employees participating in the carpool/vanpool program or using transit to and from the Planning Area in the event of personal or family emergencies. The individual would be reimbursed for a taxi ride, shared car service, or short-term car rental. Typically, this GRH benefit is limited to two-three times per year per employee to avoid abuses of the benefit. A support service such as GRH is an important part of TDM implementation that assures an individual he or she will not be dependent on a ridesharing or transit schedule in the event of an emergency.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
TDM Program. Short-Term Car Rentals. The project could partner with short-term car rental services such as Zip-Car or Car-to-Go, which would provide vehicles available to users for hourly rentals at strategic locations within the City area. Similar to the GRH program, this service offers assurance to users of alternative modes of transit that they have options should the need arise to leave at an unscheduled time. Short-term car rentals could be used to travel to business meetings, lunch, or in emergencies, and could provide the source of emergency transportation for those using the GRH program.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:
TDM Program. Incentives for Using Alternative Travel Modes. The project TMC could incorporate various incentives for use of its programs. For example, eligible employees could be provided with discounted monthly transit passes for Metro rail and bus service. Carpool and vanpool users could be offered preferential load/unload areas or convenient designated parking spaces. Those who choose not to drive their own cars and park them at the project site could receive a "parking cash-out" subsidy.	Development Services Department • (Applicant is responsible for implementation)	Prior to the issuance of a certificate of occupancy. • Mitigation to continue over the project's lifetime.	Date: Name & Title:

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TDM Program. Mobility Hub Support. The project could support efforts to provide first-mile and last-mile service for transit users through the mobility hub program. Mobility hubs, typically located at or near public transit centers, provide amenities such as bicycle parking and rentals, shared vehicle rentals (e.g., Zip-Car), and transit information. The project could provide space for similar amenities at the project site to complement future mobility hubs in the Study Area.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of a certificate of occupancy.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:
TSM Improvements. Signal Controller Upgrades. Many study intersections within the City currently operate with the Type 170 signal controller while newer controllers (Type 2070) provide for enhanced and real-time operation of traffic signal timing. The City recommends traffic signal controller upgrades to a Type 2070 Controller, as well as 322 cabinets to replace the existing aging cabinets. These improvements would provide system-wide benefits.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>Prior to the issuance of a certificate of occupancy.</i> • Mitigation to continue over the project's lifetime.	Date: Name & Title:
TSM Improvements. CCTV Cameras. The potential TSM improvements include funding for the installation of CCTV cameras and the necessary infrastructure (including fiber optic and interconnect tubes). An integral part of the real-time operation of the traffic signal timings, the strategic placement of CCTV cameras at key intersections provides the City with the ability to monitor traffic operations and respond instantly to incidents that delay vehicles and transit service.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>During the project's construction phase.</i> • Mitigation ends when construction is completed.	Date: Name & Title:
TSM Improvements. System Loops. The potential TSM improvements include funding the installation of system loops at signalized intersections within the identified corridors. A system loop is an advance detector loop that is embedded in the street pavement. These loops identify traffic volume and lane occupancy and are used to determine the appropriate signal timing parameters. These loops give the City the ability to extend the green time for an approach so that groups of vehicles generally do not have to stop when travelling along synchronized-signal corridors. They are located at an appropriate distance from the intersection so that a vehicle just upstream of the loop can comfortably decelerate to a stop when the yellow signal is displayed.	Development Services Department • <i>(Applicant is responsible for implementation)</i>	<i>During the project's construction phase.</i> • Mitigation ends when construction is completed.	Date: Name & Title:

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Measure	Enforcement Agency	Monitoring Phase	Verification
<p>Intersection 11. Atlantic Boulevard & Telegraph Road. Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Atlantic Boulevard to provide an exclusive northbound right-turn lane. The resulting northbound approach would consist of two left-turn lanes, one shared left/right-turn lane, and one right-turn lane. This improvement could be accommodated within the existing right-of-way since the City owns the land on the east side of Atlantic Boulevard north of the freeway overpass. The improvement would require widening and reconstruction along the east side of the northbound leg from the north end of the bridge over I-5 to Telegraph Road. Due to the geometric limitations and the financial infeasibility of widening the bridge over I-5, the resulting northbound right-turn lane would be approximately 100 feet long, but it would provide some relief to intersection operations. <i>Should this improvement be determined infeasible during the design process, the impact at the intersection would remain and be considered significant and unavoidable.</i> A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.</p>	<p style="text-align: center;">Development Services Department • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name & Title:</p>
<p>Intersection 17. I-5 Ramps/Commerce Casino & Telegraph Road. Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Telegraph Road to provide an additional westbound left-turn lane to the I-5 Northbound On-Ramp. This improvement cannot be completed under the existing right-of-way and would require additional widening along the north side of Telegraph Road. The resulting westbound approach would consist of two left-turn lanes, two through lanes and one through/right-turn lane. In order to accept the dual left-turn lanes, the freeway on-ramp would also have to be widened and ramp meters would have to be installed to meter the traffic onto the freeway. This intersection improvement would have to be approved by both the City and by Caltrans. <i>Should this improvement be determined infeasible during the review process, the impact at the intersection would remain and be considered significant and unavoidable.</i> A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.</p>	<p style="text-align: center;">Development Services Department • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name & Title:</p>

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<p>Intersection 18. Washington Boulevard & Telegraph Road. Although implementation of the TDM program and TSM improvements would reduce the traffic impact identified at this intersection, the impact would remain significant without additional physical improvement measures. The significant traffic impact at this intersection could be mitigated and reduced to less than significant levels by widening and restriping Washington Boulevard to provide an exclusive northbound right-turn lane onto Telegraph Road. This improvement cannot be completed under the existing right-of-way and would require additional widening along the east side of Washington Boulevard, south of Telegraph Road. The resulting northbound approach would consist of two left-turn lanes, two through lanes and one right-turn lane. <i>Should this improvement be determined to be infeasible during the design process, the impact at the intersection would remain and be considered significant and unavoidable.</i> A conceptual plan of the improvement is provided in Appendix E of the Traffic Study, which is provided under a separate cover in Appendix Volume 3.</p>	<p style="text-align: center;">Development Services Department • <i>(Applicant is responsible for implementation)</i></p>	<p style="text-align: center;"><i>Prior to the issuance of any building or grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name & Title:</p>