

GRISWOLD RESIDENTIAL PROJECT

SCH NO. 2022020004

prepared for
County of Los Angeles
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Los Angeles, CA 90012

prepared with the assistance of
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August 2023

Final Environmental Impact Report

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FINAL
ENVIRONMENTAL IMPACT REPORT
MERITAGE GRISWOLD RESIDENTIAL PROJECT
LOS ANGELES COUNTY, CALIFORNIA
STATE CLEARINGHOUSE NO. 2022020004

Project No. 2020-001386
Tentative Tract Map No. 83183 (RPPL 2020004447),
Conditional Use Permit No. RPPL 2021005384,
Environmental Assessment No. RPPL 2020004450

PREPARED FOR:

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ACRONYMS AND ABBREVIATIONS

°C	degrees celsius
µg/m ³	micrograms per cubic meter
AB 52	California Assembly Bill 52
ACM	asbestos-containing material
AF	acre-feet
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
AQIA	Air Quality Impact Analyses
AQMP	Air Quality Management Plan
APN	Assessor's Parcel Number
ATCM	airborne toxic control measure
BAAQMD	Bay Area Air Quality Management District
BACM	best available control measure
BACT	best available control technology
Basin	South Coast Air Quality Basin
BAU	business as usual
BFE	base flood elevation
bgs	below ground surface
BMPs	Best Management Practices
CAA	Clean Air Act of 1970
CAAA	CAA Amendments of 1990
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan of 2013
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act of 1988
CDA	Chino Desalter Authority
CDFW	California Department of Fish and Wildlife
CC&Rs	Covenants, Conditions, and Restrictions
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGEU	California Gas and Electric Utilities 2016 California Gas Report
CGS	California Geological Survey
CH ₄	methane
CHAPIS	Community Health Air Pollution Information System (CARB)
CHRIS	California Historical Resources Inventory System
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CTP	Clean Truck Program
CUP	Conditional Use Permit

dB	decibel
dBA	A-weighted decibels
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EMS	Emergency Medical Services
ESA	Environmental Site Assessment
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act of 1973
FMMP	Farmland Mapping and Monitoring Program
gal/day	gallons per day
GHG	greenhouse gas
GWP	global warming potential
Handbook	Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005)
HAPs	hazardous air pollutants
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HDT	Heavy Duty Trucks
HFCs	hydroflourocarbons
Hot Spots Act	Air Toxics Hot Spots Information and Assessment Act of 1987
HP	horsepower
HPLV	High Pressure Low Volume
HVAC	heating, ventilating, and air conditioning
ICU	intersection capacity utilization
I	Interstate
IEUA	Inland Empire Utilities Agency
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LEED	Leadership in Energy and Environmental Design
LEV	Low Emission Vehicle
LID	low impact development
LOS	level of service
LSTs	localized significance thresholds
MACT	maximum available control technology
MBTA	Migratory Bird Treaty Act of 1918
MCC	Material Culture Consulting
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MPO	metropolitan planning organization
MT	metric tons
MT CO _{2e}	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
N ₂ O	nitrous oxide
NAHC	Native American Heritage Commission
NALs	numeric action levels
NCCP	Natural Community Conservation Plan
NESHAP	national emissions standards for HAPs
NH ₃	ammonia
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic and Safety Administration

NOP	Notice of Preparation
NO ₂	nitrogen oxide
NO _x	nitrogen oxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	U.A. Department of Agriculture Natural Resources Conservation Service
O ₃	ozone
Pb	lead
PDF	project design feature
PFCs	perfluorocarbons
PM _{2.5}	particulate matter less than 2.5 micrometers in aerodynamic diameter
PM ₁₀	particulate matter less than 10 micrometers in aerodynamic diameter
ppb	parts per billion
PPP	Plans, Programs, and Policies
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Plan
PWS	public water supplier
REC	recognized environmental conditions
ROG	reactive organic gas
RP-5	IEUA Regional Water Recycling Plant No. 5
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SB 18	California Senate Bill 18, Ch. 905 (2004)
SC	Standard Condition
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison Company
SCS	Sustainable Communities Strategy
SF	square feet
SF ₆	sulfur hexafluoride
SIP	state implementation plan
SO ₂	sulfur dioxide
SO ₃	sulfur trioxide
SO ₄	sulfates
SoCalGas	Southern California Gas Company
SO _x	sulfur oxides
SP	Specific Plan
SR	State Route
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	Storm Water Resources Control Board
TACs	toxic air contaminants
TIA	Traffic Impact Analysis
tpy	tons per year
TTCP	traditional tribal cultural places
TUA	traditional use area
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service

UTRs	utility tractors
UWMP	Urban Water Management Plan
VdB	velocity levels expressed in decibel notation
VMT	vehicle miles travelled
VOC	volatile organic compounds
WDR	Waste Discharge Requirements
WFA	Water Facilities Authority
Williamson Act	California Land Conservation Act of 1965
WQC	Water Quality Certification

1. Introduction

This Final Environmental Impact Report (FEIR; Final EIR) has been prepared in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from construction and operation of the proposed Griswold Residential Project (proposed Project).

According to CEQA Guidelines Section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR; Draft EIR) or a revision of the Draft EIR;
- (b) Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- (d) The responses of the lead agency to significant environmental points raised in the review and consultation process;
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR during the public review period, which began June 8, 2023 and ended on July 24, 2023. This document has been prepared in accordance with CEQA, the State CEQA Guidelines, and represents the independent judgment of the lead agency, the County of Los Angeles. This document and the circulated Draft EIR comprise the Final EIR in accordance with CEQA Guidelines, Section 15132.

1.1 Format of the Final EIR

The following chapters are contained within this document:

Chapter 1, Introduction. This chapter describes CEQA requirements and the content of the Final EIR.

Chapter 2, Response to Comments. This chapter provides a list of agencies and organizations who commented on the Draft EIR, as well as copies of their comment letters received during and following the public review period, and individual responses to their comments.

Chapter 3, Revisions to the Draft EIR. This chapter contains revisions made to the Draft EIR as a result of the comments received by agencies and organizations as described in Chapter 3, and/or to make minor modifications or corrections to the Draft EIR.

The County of Los Angeles has determined that none of this material constitutes significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. The additional material merely clarifies or amplifies existing information contained in the Draft EIR and does not present any new substantive information. None of this new material indicates that the project would result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

Chapter 4, Mitigation, Monitoring, and Reporting Program. This chapter includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment” (Public Resources Code [PRC]

Section 21081.6, CEQA Guidelines Section 15097). The MMRP was prepared based on the mitigation measures included in this Final EIR and has been included as Chapter 4.0.

1.2 CEQA Requirements Regarding Comments and Responses

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be *“on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible ... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”*

CEQA Guidelines Section 15204(c) further advises, *“Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”* Section 15204 (d) also states, *“Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.”* Section 15204 (e) states, *“This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”*

In conformance with CEQA Guidelines Section 15088, the County of Los Angeles, as the Lead Agency, evaluated the comments received on the Draft EIR and prepared written responses addressing the environmental issues raised in the comments. In accordance with CEQA, PRC Section 21092.5 and CEQA Guidelines Section 15088 (b), copies of the written responses to public agencies are being forwarded to those agencies at least 10 days prior to certification of the Final EIR, with copies of this Final EIR document, which conforms to the legal standards established for response to comments on the Draft EIR pursuant to CEQA.

Chapter 2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency, the County of Los Angeles, to evaluate comments on environmental issues received from public agencies, organizations, companies, and individuals who reviewed the Draft EIR (DEIR) and prepare written responses. This section includes copies of all written comment letters received on the DEIR during the DEIR's public review period and the County of Los Angeles's responses to the comment letters. Comment letters and specific comments are numbered for reference purposes which correspond with the County's response. A summary of each numbered comment in the commenter's letter precedes the County's response.

PUBLIC COMMENTS

The following is a list of public agencies, organizations, and individuals or interested parties that submitted comments on the DEIR during the public review period. The comment letters received on the DEIR and responses to those comments are provided on the following pages.

Letter Number	Agency/Organization/Name	Comment Date Received	RTC Page Number
State Agencies			
A1	California Department of Transportation	July 25, 2023	2-2
Local Agencies			
A2	Office of the Sheriff, County of Los Angeles	July 21, 2023	2-9
A3	Los Angeles County Library	July 27, 2023	2-18

LETTER A1: California Department of Transportation, Received July 24, 2023 (3 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7- OFFICE OF REGIONAL PLANNING
 100 S. MAIN STREET, SUITE 100
 LOS ANGELES, CA 90012
 PHONE (213) 266-3574
 FAX (213) 897-1337
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 www.dot.ca.gov



Making Conservation
 a California Way of Life.

July 24, 2022

Erica G. Aguirre, AICP, Principal Planner
 LA County Planning
 320 West Temple Street
 Los Angeles, CA 90012

RE: Griswold Residential Project – Draft
 Environmental Impact Report (DEIR)
 SCH# 2022020004
 GTS# 07-LA-2022-04249
 Vic. I-10 PM 35.227

Dear Erica G. Aguirre,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would demolish the existing vacant buildings on the site (the Griswold School) and associated accessory structures and develop the site with 68 detached residential condominium units. 179 parking spaces, including 68 two-car garages and 43 onsite guest parking spaces would be provided as part of the Project. Each home also includes a full driveway that can accommodate two additional vehicles. To the north of the Project Site, there is an existing six-foot-high concrete ("CMU") wall. The Project also includes new six-foot-high CMU walls on the western and eastern boundaries of the Project Site. There would be interior walls including six-foot-high CMU walls on proposed block edges and 5.5-foot-high vinyl fencing between units.

A1.1

The nearest State facility to the proposed project is Interstate 10. After reviewing the DEIR, Caltrans has the following comments:

A1.2

As stated in the Vehicle Miles Traveled (VMT) Analysis, the project will result in a significant and unavoidable environmental impact due to VMT per capita exceeding the City's adopted thresholds by 48%. Caltrans concurs that the project will result in a significant environmental impact but does not concur that is unavoidable.

A1.3

This development continues the long-broken model of suburban sprawl with no substantive attempt to design in a way that enhances the community's resilience, sustainability, adaptability, health, or mobility. The fully separated, low-density, residential-only land use model has been proven to be an enormous financial liability, as the disproportionately high amount of land and infrastructure required to subsidize an entirely car-oriented lifestyle is simply not possible to maintain with public funds without major compromises to critical services and community well-being.

A1.4

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Erica G. Aguirre
July 24, 2023
Page 2

Currently the project is designed in a way that induces a high number of vehicle trips per household due to being an exclusively residential, car-oriented development. If you include the two driveway parking spaces in front of every garage, this project will be constructing 315 car parking spaces. This more than doubles the current parking requirements of 153, and this is already a completely unnecessary amount of parking to require. The Lead Agency is encouraged to integrate transportation and land uses in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. Caltrans recommends the following to more effectively address the significant VMT that this project creates as currently proposed:

- 1) Provide for a mixture of land use types within the Project's new zoning area to allow for adaptive reuse. This can allow goods, services, and jobs to be created closer to where the project's residents live.
- 2) Increase density, both vertically and horizontally. Land use developments, like the one proposed, should not be sprawled across huge areas of land. By bringing the built environment closer together, and building up instead of out, it becomes possible to greatly reduce energy use, improve walkability, allow for adaptive reuse, and generate real value for the community.
- 3) Reduce the amount of parking whenever possible, as abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building too much parking.
- 4) Provide affordable housing units. These units can improve housing affordability and improve the life and health of all Californians as it should always be the goal of any civilized society to reduce the suffering of all people in our communities. Additionally, rates of car ownership and vehicle miles traveled (VMT) are significantly lower for low-income households than they are for high-income households. If the project included affordable housing, then there would be an even greater justification for reducing car parking to promote affordability and achieve a more diverse and sustainable land-use pattern.
- 5) Improve connections to existing active transportation and transit infrastructure. This can be done with robust signage, wayfinding, safety improvements, and human scale amenities. Additionally, the most effective methods to reduce pedestrian and bicyclist

A1.5

A1.6

A1.7

A1.8

A1.9

A1.10

A1.11

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Erica G. Aguirre
 July 24, 2023
 Page 3

exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. By working with Foothill Transit, the 190 Line could have its frequency increased or even upgraded to a Bus Rapid Transit (BRT) line with dedicated bus-only lanes. There could also be improved connections and wayfinding to the Metrolink Baldwin Park and Covina Stations.

**A1.11
 cont.**

A1.12

Finally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

A1.13

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2022-04249.

A1.14

Sincerely,

Miya Edmonson
 Miya Edmonson

LDR Branch Chief

cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

RESPONSE TO COMMENT LETTER A1: California Department of Transportation

Comment A1.1: This comment thanks the County for including the California Department of Transportation (Caltrans) in the environmental review process for the Project and provides a summary of the Project description.

Response A1.1: The comment is introductory in nature and does not raise any significant environmental issues or contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment A1.2: This comment states that the nearest State facility to the Project is Interstate 10 and that Caltrans provides the following comments.

Response A1.2: The comment is introductory in nature and does not raise any significant environmental issues or contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment A1.3: This comment states that according to the VMT analysis, the Project will result in a significant and unavoidable environmental impact as VMT per capita will exceed the City's adopted thresholds by 48%. The comment states that while Caltrans concurs that the Project will result in a significant environmental impact, but does not concur that it is unavoidable.

Response A1.3: As explained in Section 5 of the Draft EIR with respect to Impact TR-2, to reduce the Project's Home-Based (HB) VMT to below the County's threshold of 10.2 HB VMT per capita within the South County, the Project would need to reduce its daily VMT by 1,284 VMT. The Project incorporates design features that, according to the California Air Pollution Control Officers Association (CAPCOA), reduce VMT, including the provision of a pedestrian network and onsite public parks. As shown in Table 5.1-5, CAPCOA and CAPCOA-Inspired Daily VMT Reduction, these project features reduce the Project's daily VMT by 207.1 VMT. To further reduce Project-related VMT, the Draft EIR recommends Mitigation Measure TR-1, which would further reduce the Project's daily VMT by 657 VMT. Together, the Project's CAPCOA and CAPCOA-inspired VMT reductions would reduce the Project's VMT by 854.1 VMT. Despite the incorporation of these VMT-reducing design measures and mitigation measure, however, Project generated VMT would still exceed the County's threshold of significance. Therefore, the EIR concludes that the Project would have a significant and unavoidable impact with respect to VMT. The comment states that Caltrans does not concur with the conclusion that the impact is significant and unavoidable, but the comment has not identified any feasible mitigation measures or feasible alternatives that would further substantially reduce VMT.

As discussed in Appendix M, VMT Analysis, to the Draft EIR, the Project is an infill Project with a density that aligns with and blends in with the existing neighborhood as permitted by zoning. VMT reduction strategies that can reduce VMT generated by larger sites (e.g., adding employment/retail use mixes) are not available for this Project. As also explained in Appendix M, the CAPCOA Manual states that various strategies to reduce VMT can interact, and that combining multiple strategies is subject to a global maximum project VMT reduction. However, for projects in suburban areas, the global maximum project reduction is 15%. With a global maximum of 15%, it would not be possible for any infill project in an average or above-average VMT-generation portion of the South County Baseline Area to be below the County's significance threshold (16.8% below average) when accounting for on-site VMT reductions. There are no additional feasible off-site VMT reduction measures available for the Project. As such, there would be no way to fully mitigate Project impacts related to VMT to a level that is less than significant pursuant to CAPCOA and County guidance. Therefore, the Draft EIR adequately discloses significant and unavoidable impacts related to VMT. Pursuant to CEQA, in determining whether to approve the Project, the County decisionmakers will need to consider whether the Project's benefits outweigh this significant and unavoidable impact.

Comment A1.4: This comment states that this Project continues the model of urban sprawl with no attempt to design it in a way that enhances the community's resilience, sustainability, adaptability, health, or mobility and the low-density, residential land use model results in an enormous financial liability due to the amount of land and infrastructure needed for a car-oriented lifestyle.

Response A1.4: Please refer to Response to Comment A1.3. The County disagrees with the characterization of the Project as constituting "urban sprawl." The Project is a 68-unit infill Project with a density of

approximately 7.15 dwelling units per acre, which is at the higher end of allowable density for the site under the Los Angeles County Zoning Code (a maximum of 9 units per acres is allowed under the Zoning Code). The Project would redevelop property formerly used as a school and provide market-rate housing opportunities consistent with the County's Housing Element and State housing goals.

Comment A1.5: This comment states that the Project is designed in a way that induces a high number of vehicle trips per household as it is an exclusively residential, car-oriented development. This comment states that the Project will construct 315 parking spaces, which is more than double the current parking requirements of 153.

Response A1.5: As discussed in Attachment D to Appendix M, VMT Analysis, to the Draft EIR, strategies for reducing parking were explored; however, reducing parking would only impact guest parking since each dwelling unit has an included driveway. Reducing guest parking would not be desirable for this type of development or location as it would push guest parking onto adjacent residential streets and not result in decreased VMT. Further, the Project does not propose 315 parking spaces, as asserted by the comment. Under County development standards, driveway spaces are not counted toward parking requirements; the Project would provide a total of 179 total parking spaces for approximately 2.63 parking spaces per dwelling unit. While the Project would result in an increase in the number of vehicle trips onsite, the Draft EIR properly disclosed that impacts related to VMT would be significant and unavoidable.

Comment A1.6: This comment states that the Lead Agency is encouraged to integrate transportation and land uses in a way that reduces VMT and GHG emissions by locating residential near goods and services in order to shorten trip lengths and achieve a high level of non-motorized travel and transit use. Therefore, Caltrans recommends certain measures in the following comments to effectively address the significant VMT that results from the Project.

Response A1.6: The comment is introductory in nature. Responses to the individual suggestions provided by comment are provided directly below.

Comment A1.7: This comment states that the County should provide for a mixture of land uses which would allow for goods, services, and jobs closer to where the Project residents would live.

Response A1.7: The Project would be developed consistent with the existing General Plan land use designation and zoning designation upon approval of a site plan review. Pursuant to the Los Angeles County Code, no commercial, retail, or service uses are permitted within the A-1-6000. Therefore, additional commercial, retail, or service uses could not be developed onsite without further entitlements.

Comment A1.8: This comment states that the Project should increase density in order to reduce energy use, improve walkability, allow for adaptive reuse, and generate real value for the community.

Response A1.8: As discussed in Response A1.7, the Draft EIR is not required to discuss the merits of the Project in relation to the type of land use or density proposed. In addition, the Draft EIR evaluated a Buildout of Existing Land Use and Zoning Alternative (Alternative 3), which evaluated buildout of the site at the maximum density allowed pursuant to the Los Angeles County General Plan, which would include 85 units. As discussed with respect to Alternative 3, it is likely that a denser Project alternative would result in increased energy demand as it would implement the same energy efficient infrastructure as the Project and result in additional residents. Further, the Project would include pedestrian improvements such as new sidewalks that would improve walkability over existing conditions and a denser alternative would likely not result in increased walkability.

Comment A1.9: This comment states that the amount of parking should be reduced as the amount of parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. This comment recommends implementation of Transportation Demand Management (TDM) strategies for reduced parking.

Response A1.9: As discussed in Attachment D to Appendix M, VMT Analysis, to the Draft EIR, multiple TDM strategies were explored to reduce Project-related VMT impacts. As discussed, strategies for reducing

parking were explored; however, reducing parking would only impact guest parking since each dwelling unit has an included driveway. Reducing guest parking would not be desirable for this type of development or location as it would push guest parking onto adjacent residential streets and not result in decreased VMT. Therefore, the Draft EIR adequately discloses significant and unavoidable impacts related to VMT.

Comment A1.10: This comment states that the Project should provide affordable housing units as it would improve housing affordability and reduce VMT. The comment states that the inclusion of affordable would justify reducing car parking and achieve a more diverse and sustainable land-use pattern.

Response A1.10: The Applicant's SB 330 preliminary application was submitted and deemed complete by the County before the County's Inclusionary Housing Ordinance became effective. As such, the rules applicable to the Project are vested under SB 330, which precludes the County from imposing affordable housing requirements on the housing project. Furthermore, the Project's social and economic merits are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include a discussion of affordable housing. To the degree the comment is suggesting that the Project should increase in density, please refer to Response to Comment A.1.8.

Comment A1.11: This comment states the Project should improve connections to existing active transportation and transit infrastructure through signage, wayfinding, safety improvements, and human scale amenities. This comment also recommends the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.

Response A1.11: discussed in Section 5.1, *Transportation*, of the Draft EIR, the Project would be constructed directly adjacent to a relocated Foothill Transit Line 190 bus stop and provide internal sidewalks, which would provide direct connection to the transit facility. In addition, the Project would enhance the crosswalk across San Bernardino Road, which would facilitate pedestrian access for Project residents and the surrounding community. In response to the comments of the Los Angeles County Sheriff's Department (see Comments A.2.8 and A.2.11), County staff has recommended that the County add a condition of approval to the Project, requiring the Project to enhance the existing crosswalk with in-road warning lights and signage. These modifications to the existing sidewalk would enhance pedestrian safety for Project residents and the surrounding community.

Comment A1.12: This comment states that the County could work with Foothill Transit to increase the frequency of Line 190 or upgrade it to a Bus Rapid Transit line. In addition, the comment states that there could be improved connections to the Metrolink Baldwin Park and Covina Stations.

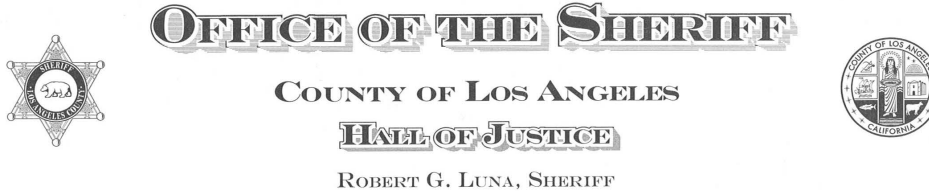
Response A1.12: As discussed in Draft EIR Chapter 5.1, *Transportation*, Foothill Transit Line 190 would likely serve the proposed Project as it runs along San Bernardino Road with an existing bus stop in front of the Project. The transit frequency at these stops is approximately every 20 minutes. Line 190 serves El Monte, Baldwin Park, Covina, and Pomona. Additionally, existing Foothill Transit Line 185 runs along Irwindale Avenue with stops located near the intersection of Irwindale Avenue and San Bernardino Avenue, less than a quarter mile away from the Project site. The transit frequency at these stops is approximately every 30 minutes. Line 185 serves Hacienda Heights, Industry, La Puente, West Covina, Irwindale, and Azusa. As part of the coordination for the Project, the Project Applicant coordinated with Foothill Transit to see if the frequency of Line 190 could be increased. Based on the discussion with Foothill Transit, existing ridership and the ridership resulting from the Project do not warrant an increase in line frequency. However, ridership needs are evaluated by Foothill Transit and the County of Los Angeles on a regular basis. In addition, the Project would implement Mitigation Measure TR-1 and would provide a website in multiple languages to Project residents that would provide information on ridesharing, carpooling, and nearby transit.

Comment A1.13: This comment states that any transportation of heavy construction equipment/materials which requires the use of oversize transport vehicles on State highways will need a Caltrans permit and it is recommended that these trips occur during off-peak commute periods.

Response A1.13: Construction traffic impacts are discussed in Section 5.1, *Transportation*. As included in PDF TR-4, the Applicant is preparing a Construction Traffic Control Plan to ensure that impacts on State facilities and City roadways are minimized. Should use of oversized-transport vehicles on State highways be required for construction, the Project Applicant and contractors will obtain all necessary permits. The County acknowledges that it is preferred that large-sized trucks utilize State highways during off-peak commute periods to the maximum extent.

Comment A1.14: This comment states that if there are any questions to contact the Caltrans project coordinator.

Response A1.14: The contact information is noted, and Caltrans District 7 will be contacted if there are any questions regarding the Project.

LETTER A2: Office of the Sheriff, County of Los Angeles, Received July 21, 2023 (6 pages)

July 21, 2023

Ms. Erica G. Aguirre, Principal Planner
County of Los Angeles
Department of Regional Planning
Subdivisions Section
320 West Temple Street, Room 170 (G10)
Los Angeles, California 90012

Dear Ms. Aguirre:

**NOTICE OF COMPLETION AND AVAILABILITY OF
DRAFT ENVIRONMENTAL IMPACT REPORT
GRISWOLD RESIDENTIAL PROJECT
REVIEW COMMENTS**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the June 2023 Notice of completion and Availability (NOC and NOA) of a Draft Environmental Impact Report (DEIR) for the Griswold Residential Project (Project). The proposed Project is located at 16209 East San Bernardino Road, Covina in the unincorporated area of East Irwindale in the Los Angeles County (County). The Project site is approximately 9.61-acre on the former Griswold Elementary School. The proposed project consists of 68 detached condominium residential units ranging in size from approximately 1,677 to 2,300 square feet, two common open space areas, and 179 parking spaces.

A2.1

The proposed Project is located within the service area of the Department's San Dimas Sheriff's Station (Station). Due to cumulative impacts, the proposed Project will impact the current level of service provided by the Station for the potential increase in visitors, daytime and nighttime population proposed by the Project. The Project Applicant will be required to pay all required law enforcement mitigation fees and City developer fees associated with the project, as applicable. Additional resources to address the needs of the development will need to be reviewed by your City and our Contract Law

A2.2

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

Ms. Aguirre

- 2 -

July 21, 2022

Enforcement Bureau in coordination with our Station. Accordingly, the Station reviewed the Draft EIR and provided the attached focused plan review comments (see correspondence dated July 18, 2022, from Captain Walid Ashrafnia).

**A2.2
cont.**

Also, for future reference, the Department provides the following updated address and contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

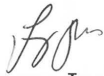
A2.3

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Mr. Immanuel Chiang, of my staff, at (323) 526-5637.

Sincerely,

ROBERT G. LUNA, SHERIFF



Tracey Jue, Director
Facilities Planning Bureau

SH-AD-32A (8/17)

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: July 18, 2022

FILE NO:

OFFICE CORRESPONDENCE**FROM:**WALID S. ASHRAFANIA, CAPTAIN
SAN DIMAS STATION**TO:**TRACEY JUE, DIRECTOR
FACILITIES PLANNING BUREAU

**SUBJECT: REVIEW COMMENTS ON NOTICE OF COMPLETION AND AVAILABILITY OF
DRAFT ENVIRONMENTAL IMPACT REPORT FOR GRISWOLD RESIDENTIAL
PROJECT**

San Dimas Sheriff's Station has reviewed the Notice of Completion and Availability (NOC/NOA) of a Draft Environmental Impact Report (DEIR), dated June 2023, for the Griswold Residential Project. The project proposes a residential development on an approximately 9.61-acre former Griswold Elementary School located at 16209 East San Bernardino Road, Covina, in the unincorporated area of East Irwindale in the County of Los Angeles. The proposed project consists of 68 detached condominium residential units, two common open space areas, stormwater infrastructure, private driveways and fire lanes, and 179 parking spaces. All units are proposed to be two stories high, not to exceed 25 feet high, ranging in size from approximately 1,677 to 2,300 square feet, and include front and rear yards. The project would demolish the existing buildings at Griswold Elementary School.

A2.4

The proposed project, which will increase the day and nighttime population of the station's service area, will generate an increased demand for law enforcement services. The Department does not currently have a standard law enforcement service ratio because staffing level needs vary from station to station due to service call volume and type, patrol and travel time by priority, personnel workload, performance levels, and modeling the flow of calls for service ratio. Assigning additional law enforcement personnel to the station to meet acceptable service ratios will require modification of the law enforcement service contract, additional support personnel and equipment assets.

A2.5

This project development will result in population growth. This will warrant Department, Chief Executive Office (CEO), and Board of Supervisors (BOS) representatives to conduct an assessment and execute a law enforcement services agreement based upon Department staffing needs as a result of this project.

IMPACT MEMO GRISWOLD RESIDENTIAL PROJECT

JULY 19, 2023

To date, the San Dimas station is currently understaffed and assigning additional law enforcement personnel to the station to meet an acceptable service ratio will require modification of the law enforcement services contract, additional support personnel and equipment assets. Lack of facility space for additional law enforcement personnel and/or support staff may need to be addressed to resolve the cumulative impacts. The project applicant will be required to pay all required law enforcement mitigation fees and County developer fees associated with the project, if applicable. Additional resources to address the needs of the development will need to be reviewed by the County and our Contract Law Enforcement Bureau in coordination with San Dimas Station.

A2.5
cont.

According to Section 5.1 Transportation, Impact TR-2 of the DEIR page 5.1-10, it is noted the vehicle miles travel (VMT) for the proposed project is anticipated to cause significant and unavoidable impacts. The proposed project would generate a significant increase in the number of daily trips, which would potentially cause a significant traffic impact on the neighborhoods surrounding the proposed project. San Dimas Station reviewed and issued a response memo on March 3, 2022, and provided additional comments due to the anticipated significant traffic increase. The station reviewed the concept site plan Figure 3-6 to provide the following comments:

A2.6

"After a second review of the Griswold Residential Project Plan, taking into consideration improvements made regarding the egress and ingress of traffic, San Dimas Station is still concerned with having adequate resources to provide quality police services. With this type of project, building 68 detached condominium residential units, San Dimas Station will still need additional resources in the form of personnel and equipment to provide the level of service impacted communities are currently accustomed to receiving. Services and resources, in the form of crime and traffic enforcement, will need to increase to maintain acceptable response times and address quality of life issues. If the population growth is at a level we cannot maintain quality service, the impact will harm the communities we serve."

1. Special Protection Requirements or Recommendations:

- a. The Department recommends the complex to create a main entry driveway at the east side, and the west side entry driveway to become a secondary emergency egress and ingress. Also, to move the west side entry driveway some distance away to the east to provide adequate distance separation from the existing pedestrian crossing.
- b. The Department recommends applicant to upgrade the pedestrian crossing safety features by adding the embedded in-road warning lights and enhanced warning alert such as flashing lights.

A2.7

A2.8

IMPACT MEMO GRISWOLD RESIDENTIAL PROJECT

JULY 19, 2023

Currently, San Dimas Station has no further comments on the proposed project. However, the station reserves the right to amend or supplement our assessment upon subsequent reviews of the proposed project once additional information becomes available.

A2.9

Thank you for including San Dimas Station in the review process for the proposed project. Should you have any questions regarding this matter, please contact Immanuel Chiang, Departmental Facilities Planner I, at (323) 526-5637, of our Facilities Planning Bureau.

WAS:EAS:eas

Conceptual Site Plan



The Department recommends the complex to create a main entry driveway at the east side, and the west side entry driveway to become a secondary emergency egress and ingress. Also, to move the west side entry driveway some distance away to the east to provide adequate distance separation from the existing pedestrian crossing.

Griswold Residential Project

Applicant to upgrade the pedestrian crossing safety features by adding the embedded in-road warning lights and enhanced warning alert such as flashing lights

A2.10

A2.11

RESPONSE TO COMMENT LETTER A2: Office of the Sheriff, County of Los Angeles

Comment A2.1: This comment thanks County Regional Planning for including the Los Angeles County Sheriff's Department in the environmental review process for the Project and provides a summary of the Project description.

Response A2.1: The comment is introductory in nature and does not raise any significant environmental issues or contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment A2.2: This comment states that the Project is located within the service area for the San Dimas Sheriff's Station and due to cumulative impacts, the Project will impact the level of service provided by the Station. The comment states that the Project Applicant will be required to pay all required law enforcement mitigation fees and City developer fees associated with the Project. The comment states that the Station has reviewed the Draft EIR and provided focused plan review comments.

Response A2.2: As discussed in Chapter 6.0, *Other CEQA Considerations*, of the Draft EIR, in 2020, the San Dimas Sheriff's Station had 137 personnel which includes sworn and non-sworn positions. Based on the LASD's 2019 Synopsis, the total population of the area served by the San Dimas Sheriff's Station was 84,240 people. The San Dimas Station's officer to population ratio is approximately 1.63 officers per 1,000 population. Further, as discussed in the County of Los Angeles General Plan EIR, Los Angeles Sheriff's Department's desired officer to population ratio is 1 officer per 1,000 residents.¹ The residential population of the Project site would be approximately 262 residents and based on the Sheriff's Department's 2019 staffing of 1.63 officers per thousand population, the proposed Project would not require any additional officers. Further, the Project Applicant would be required to pay all applicable development fees and future residents would pay taxes, which would help offset the demand for sheriff services.

Comment A2.3: This comment provides an updated address and contact information for all requests to review comments, law enforcement service information, CEQA documents, and other correspondence.

Response A2.3: Future CEQA notices will be sent to the provided contact information. The comment does not raise any significant environmental issues or contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment A2.4: This comment states the San Dimas Sheriff's Station has reviewed the Draft EIR and provides a summary of the Project description.

Response A2.4: The comment is introductory in nature and does not raise any significant environmental issues or contain any information requiring changes to the Draft EIR. Please note that, as stated on page 1-2 of the Draft EIR, footnote 1, following publication of the notice of preparation (NOP), the school buildings were damaged in a fire and were demolished for safety purposes. Therefore, the Project no longer includes demolition of the existing school buildings. No further response is warranted.

Comment A2.5: This comment states that the Project would increase the day and nighttime service population of the Station's service area which would generate an increased demand for law enforcement. The comment states that the Department does not have a standard law enforcement service ratio because staffing level needs vary from station to station. The comment states that the San Dimas Station is currently understaffed and assigning additional law enforcement personnel to the station to meet acceptable service ratios will require modification of contracts, additional support personnel, and equipment assets.

Response A2.5: The comment does not provide substantial evidence of a significant environmental impact. As discussed in Response A2.2, the residential population of the Project site would be approximately 262 residents and based on the Sheriff's Department's 2019 staffing of 1.63 officers per thousand population, the proposed Project would not require any additional officers. Therefore, as the Department does not have any standard law enforcement service ratio, no additional officers would be required to service the Project site. Further, despite the current understaffing at the Station, the proposed Project would not result in a

¹ Placeworks. Los Angeles County General Plan Update Draft Environmental Impact Report. June 2014. Pages 5.14-12 and 5.14-16

substantial residential population in a manner which would require further law enforcement personnel resulting in the need to construct additional facilities, thereby resulting in an environmental impact.

Comment A2.6: This comment states that according to the Draft EIR, VMT is anticipated to result in significant and unavoidable impacts and the Project will generate a significant increase in the number of daily trips which would result in increased traffic. The comment states that the San Dimas Station reviewed the site plan and provided comments on March 3, 2022 related to the Station's concern with the need for additional resources in the form of personnel and equipment to provide services to the Project site.

Response A2.6: The comment does not provide substantial evidence of a significant environmental impact. As discussed in Response A2.2, the residential population on the Project site would be approximately 262 residents and based on the Sheriff's Department's 2019 staffing of 1.63 officers per thousand population, the proposed Project would not require any additional officers. Therefore, as the Department does not have any standard law enforcement service ratio, no additional officers would be required to service the Project site. Further, as discussed in Section 6.0 of the Draft EIR, the proposed Project would not result in a substantial residential population in a manner which would require further law enforcement personnel resulting in the need to construct additional facilities, thereby resulting in an environmental impact.

Comment A2.7: This comment states that the Project should include a main entry driveway on the east side of the site and the west driveway should become a secondary emergency access. Further, the comment states that the western driveway should be moved east to provide additional separation from the existing pedestrian crossing.

Response A2.7: The comment is in regard to the design of the Project and does not reference specific concerns related to the environmental analysis within the Draft EIR. However, the main entry driveway is aligned with North Woodgrove Avenue and offsetting the driveway from the existing intersection could potentially result in traffic engineering incompatibility issues. In addition, relocating the main driveway to the east of the Project site would result in the main driveway not aligning with a street, which could result in potential traffic safety issues as there is no intersection at the eastern portion of the site on San Bernardino Road. Further, the site plan has been evaluated for potential emergency access issues by County staff and the Los Angeles County Fire Department and it has been determined that one access is sufficient for emergency access to the proposed Project. The comment does not require any changes to the Draft EIR but will be forwarded to County decisionmakers as part of the Final EIR.

Comment A2.8: This comment states that the Applicant should upgrade the pedestrian crossing safety features by adding embedded in-road warning lights and enhanced warning alerts such as flashing lights.

Response A2.8: The comment is in regard to the design of the Project and does not reference specific concerns related to the environmental analysis within the Draft EIR. However, in response to this comment, County staff hereby recommends that the County add a condition of approval to the Project requiring the Project to enhance the existing crosswalk with in-road warning lights and signage. The comment does not require any changes to the Draft EIR but will be forwarded to County decisionmakers as part of the Final EIR.

Comment A2.9: This comment states that the San Dimas Station has no further comments on the Project, but reserves the right to amend or supplement its assessment of the Project. This comment thanks the County and provides contact information.

Response A2.9: Comment A2.9 is general in nature. The comment does not raise any significant environmental issues or reference a specific section or analysis within the Draft EIR. No further response is required.

Comment A2.10: This comment includes the Conceptual Site Plan for the Project and states that the Project should include a main entry driveway on the east side of the site and the west driveway should become a secondary emergency access. Further, the comment states that the western driveway should be moved east to provide additional separation from the existing pedestrian crossing.

Response A2.10: The comment is in regard to the design of the Project and does not reference specific concerns related to the environmental analysis within the Draft EIR. Further, as discussed in Response A2.7, the proposed driveway is appropriately aligned for the Project. The comment does not require any changes to the Draft EIR but will be forwarded to County decisionmakers as part of the Final EIR.

Comment A2.11: This comment includes the Conceptual Site Plan for the Project and states that the Applicant should upgrade the pedestrian crossing safety features by adding embedded in-road warning lights and enhanced warning alerts such as flashing lights.

Response A2.11: The comment is in regard to the design of the Project and does not reference specific concerns related to the environmental analysis within the Draft EIR. However, as further discussed in Response A2.8, in response to this comment, County staff recommends that the County add a condition of approval to the Project requiring the Project to enhance the existing crosswalk with in-road warning lights and signage. The comment does not require any changes to the Draft EIR but will be forwarded to County decisionmakers as part of the Final EIR.


LETTER A3: Los Angeles County Library, Received July 27, 2023 (4 pages)

SKYE PATRICK
Library Director

July 27, 2023

TO: Erica G. Aguirre
Department of Regional Planning

FROM: Skye Patrick
County Librarian



A3.1

COMMENTS FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GRISWOLD RESIDENTIAL PROJECT, PROJECT NO. 2020-001386-(1)

This is to provide comments regarding the Griswold Residential Project which proposes the development of 68 residential units. Attached is a report of LA County Library's analysis of the development and the projected impact to services.


If you have any questions or need additional information, please contact Elsa Muñoz at (562) 940-8450 or EMunoz@library.lacounty.gov.

Attachments

SP:YP:GR:EM

c: Jesse Walker-Lanz, Assistant Director, Public Services, LA County Library
Ting Fanti, Departmental Finance Manager, Budget and Fiscal Services, LA County Library

[https://lacounty.sharepoint.com/sites/publiclibrary/docs/StaffServices/Documents/DIR/Griswold Residential/Griswold Residential Project response.doc](https://lacounty.sharepoint.com/sites/publiclibrary/docs/StaffServices/Documents/DIR/Griswold%20Residential/Griswold%20Residential%20Project%20response.doc)



7400 E Imperial Hwy, Downey, CA 90242 | 562.940.8400 | LACountyLibrary.org

COUNTY OF LOS ANGELES SUPERVISORS

HILDA L. SOLIS <small>1st District</small>	HOLLY J. MITCHELL <small>2nd District</small>	LINDSEY P. HORVATH <small>3rd District</small>	JANICE HAHN <small>4th District</small>	KATHRYN BARGER <small>5th District</small>
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**LA COUNTY LIBRARY
COMMENTS FOR THE GRISWOLD RESIDENTIAL PROJECT**

The project area is served by the West Covina Library, located at 1601 W Covina Parkway, West Covina, CA 91790, which is 2.0 miles from the project site. Baldwin Park Library, located at 4181 Baldwin Park Blvd., Baldwin Park, CA 91706, is 2.3 miles from the project site and is the next closest library.

A3.2

West Covina Library has a facility size of 42,345 square feet, a collection of 93,705 books and other library materials, and 29 public access computers (as of June 30, 2022). The library serves the residents of unincorporated West Covina area of the County of Los Angeles and the City of West Covina, a total population of 72,904. LA County Library service level guidelines entail a minimum of 0.50 gross square foot of library facility space per capita, 3.0 items (books and other library materials) per capita for regional libraries and 2.75 items per capita for community libraries, and 1.0 public access computer per 1,000 people served.

West Covina Library is a regional library and based on these guidelines does not currently meet the minimum requirements for the population of this service area. The current deficiency is 125,004 collection items, and 44 public access computers. To meet the service demands of the area with the proposed Griswold Residential Project, the library will require a total of 219,495 books and other library materials, and 73 public access computers.

A3.3

The proposed project, which falls within the unincorporated areas of the County, involves the construction of 68 residential units, with an estimated population increase of 262, will create a demand for an additional 786 books and other library materials, over the current deficiency, and will affect the library's capacity to serve the residents of the area.

We estimate the total increased service cost related to the proposed project to be approximately \$22K which is illustrated by the following chart:

Griswold Residential Project	Impact Per Capita (population of 262)	Estimated Costs	Total Costs
a. Building	131	\$0	\$0
b. Land (4:1 land to building ratio)	524	\$0	\$0
c. Collections	786	\$28	\$22,008
d. Public Access Computers	0	\$0	\$0
Total			\$22,008

A3.4

In efforts to minimize the impact of residential projects on library services LA County Library collects a one-time Library Facilities Mitigation Fee (Developer Fee) at the time building permits are requested for all new residential dwellings located within the unincorporated areas of the County served by the LA County Library. The current Developer Fees are as follows, by Library Planning Area, these fees are subject to a CPI increase effective July 1:

A3.5

FY 2023-24 Library Facilities Mitigation Fee Schedule

Planning Area	Fee per Dwelling Unit
Area 1 - Santa Clarita Valley	\$1,136
Area 2 - Antelope Valley	\$1,100
Area 3 - West San Gabriel Valley	\$1,148
Area 4 - East San Gabriel Valley	\$1,134
Area 5 - Southeast	\$1,137
Area 6 - Southwest	\$1,145
Area 7 - Santa Monica Mountains	\$1,139

A3.5
cont.

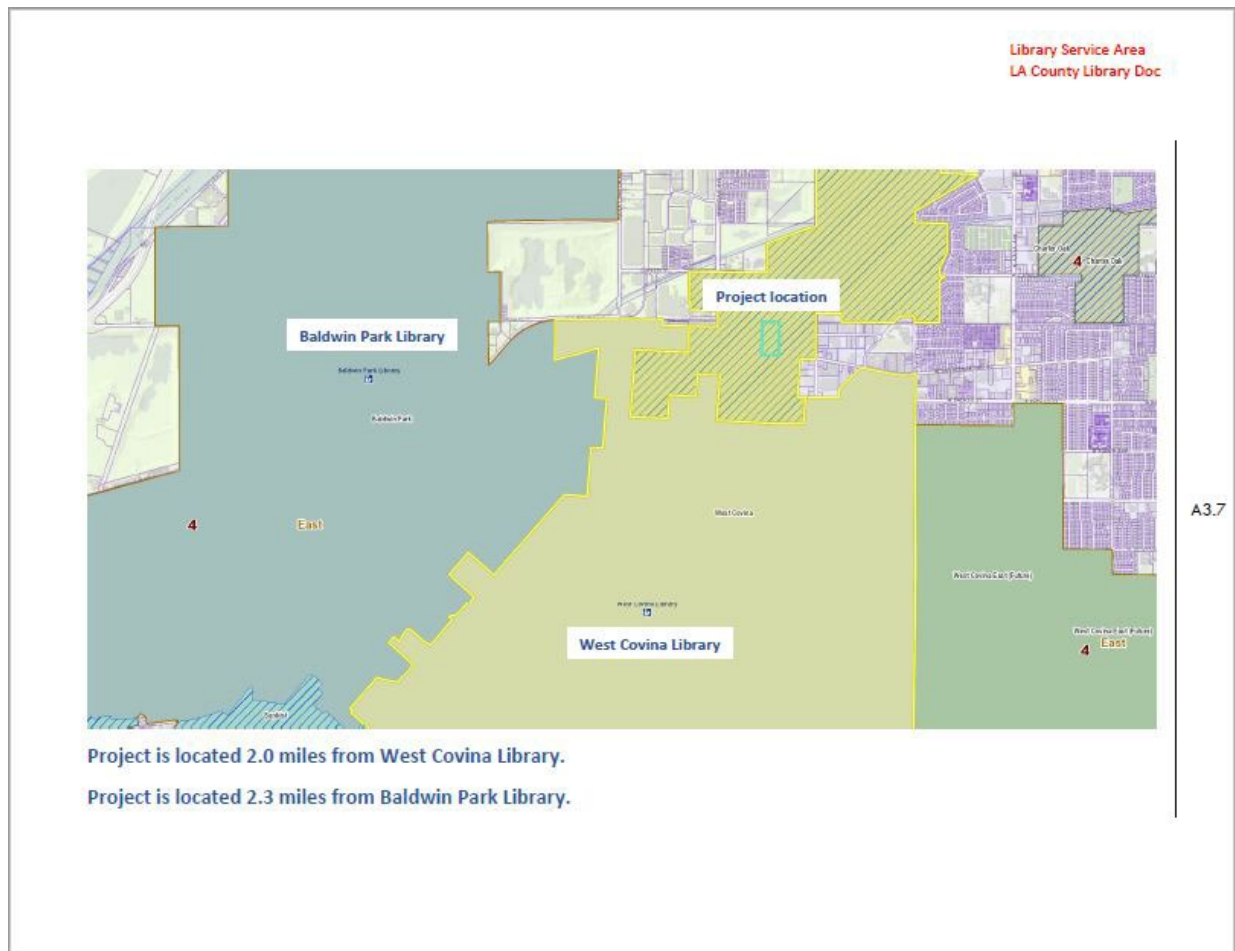
The Griswold Residential Project is within the Library's Planning Area 4 – East San Gabriel Valley, current Developer Fee is \$1,134 per dwelling unit for a total of \$77,112 (\$1,134 x 68 dwelling units).

LA County Library also collects an annual special tax which is levied on parcels within 10 cities (Cudahy, Culver City, Duarte, El Monte, La Cañada Flintridge, Lakewood, Lomita, Lynwood, Maywood, and West Hollywood) and unincorporated areas serviced by LA County Library. The Special Tax Rate for FY 2023-24 is \$33.86 per parcel.

Although the Library Facilities Mitigation Fee will mitigate the impact of the proposed project, a deficiency of books, materials, and public computers will continue to exist. LA County Library is open to discuss options regarding mitigation efforts and support for the continued enhancement and delivery of library services to the residents of West Covina.

A3.6

[https://lacounty.sharepoint.com/sites/publiclibrary/docs/staffservices/Documents/EIR/Griswold Residential/Griswold Residential Project response.doc](https://lacounty.sharepoint.com/sites/publiclibrary/docs/staffservices/Documents/EIR/Griswold%20Residential/Griswold%20Residential%20Project%20response.doc)



RESPONSE TO COMMENT LETTER A2: Los Angeles County Library

Comment A3.1: This comment states that the intent of the letter is to provide comments on the Project. The comment also provides a contact for further correspondence.

Response A3.1: The comment is introductory in nature and does not raise any significant environmental issues or contain any information requiring changes to the Draft EIR. The contact information is noted, and Elsa Muñoz will be contacted if there are any questions regarding the Project. No further response is required.

Comment A3.2: This comment states that the Project is served by the West Covina Library. The comment also describes characteristics of the library including its location, service area, service population, building size, and collection and resource size.

Response A3.2: This comment is general in nature and does not reference a specific section of the Draft EIR or environmental concern. As noted in the Initial Study included as Appendix A to the Draft EIR, the West Covina Library and the Baldwin Park Library would provide library services to the Project. No further response is warranted.

Comment A3.3: This comment provides the Los Angeles County service level guidelines, which are 0.50 gross square foot of library facility per capita, 3 items per capita for regional libraries like West Covina Library, and 1 public access computer per 1,000 people served. The comment states that the West Covina Library does not meet these requirements and provides the number of resources needed to meet these guidelines.

Response A3.3: As discussed in the Draft EIR and the Initial Study, the Project would result in approximately 262 residents, thereby placing an additional demand on the LA County Library system. However, as discussed on page 6-54 of the Draft EIR, the Project would be required to pay library facilities mitigation fees as set forth in County Code Section 22.246.060 at the time the Project's SB330 applicant was vested, which would serve to offset costs of additional library items and public access computers and minimize impacts to library services.² Further, as disclosed in the comment letter, the existing West Covina Library meets the LA County Library service level guidelines for square footage. Therefore, the Project would not result in the need for new or physically altered library facilities as the Project's residential population in addition to the existing service population would still be within the service level guidelines of 0.5 square foot per 1,000 residents.

Comment A3.4: This comment describes the Project and the estimated demand for additional library resources as a result of the Project. The estimated amount to cover the cost of additional collections resources is \$22,008.

Response A3.4: The comment does not provide substantial evidence of a significant environmental impact. As discussed in Response A3.3, the Project Applicant would pay library facilities mitigation fees as set forth in County Code Section 22.246.060 which would serve to offset costs of additional library items such as books and public access computers and minimize impacts to library services.

Comment A3.5: This comment states that a one-time Library Facilities Mitigation Fee must be paid by the developer to cover the cost of new residential construction. The Project Applicant would be required to pay \$77,112, as well as a special annual tax.

Response A3.5: As discussed in Response A3.3, the Project Applicant would pay library facilities mitigation fees as set forth in County Code Section 22.246.060 which would serve to offset costs of additional library items such as books and public access computers and minimize impacts to library services.

Comment A3.6: This comment states that the library facilities mitigation fees would mitigate the impact resulting from the proposed Project, a deficiency of books, materials, and public computers will continue to exist. The comment states that LA County Library is open to further discussion to enhance library services for the residents of West Covina.

² LA County Library. October 2019. <https://file.lacounty.gov/SDSInter/bos/supdocs/141175.pdf>

Response A3.6: As discussed in Response A3.3 and the comment letter, payment of library facilities mitigation fees would mitigate impacts resulting from the proposed Project. Therefore, the Project would not result in impacts to library services pursuant to CEQA. However, this comment will be forwarded to County decision makers as part of the Final EIR.

Comment A3.7: This comment includes an exhibit to map the Project and the nearest libraries.

Response A3.7: This comment is conclusory and general in nature. The comment does not raise any significant environmental issues or reference a specific section or analysis within the Draft EIR. No further response is required.

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Chapter 3. Revisions to the Draft EIR

This section contains revisions to the Draft EIR based upon: (1) clarifications required to prepare a response to a specific comment; and/or (2) typographical errors. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the Draft EIR. Changes made to the Draft EIR are identified here in ~~strikeout~~ text to indicate deletions and in underlined text to signify additions.

3.1 Revisions in Response to Written Comments and County Changes to Text

The following text has been revised in response to comments received on the Draft EIR and corrections identified by the County.

Chapter 1, Executive Summary

Section 1.2 Project Description Summary, paragraph 1 on page 1-2, has been revised as follows:

The proposed Project includes Project Number PRJ2020-001386, ~~Vesting~~-Tentative Tract Map Number 83183 (RPPL2020004447), Conditional Use Permit Number RPPL2021005384, and Environmental Assessment Number RPPL2020004450. The Project applicant would demolish the existing vacant buildings on the site (the Griswold School)¹ and associated accessory structures and develop the site with approximately 68 detached residential condominium units. The proposed Project would have a density of approximately 7.15 dwelling units per net acre. The proposed residential development would include single family residences with their private driveways and outdoor areas on one common lot. All homes would have front and back lawns, and driveways accessed from the Project's proposed internal, shared private drives and fire lanes. In addition, designated areas would be provided adjacent to East San Bernardino Road that would be developed with an underground biofiltration basin and landscaping. A total of approximately 179 parking spaces, including 68 two-car garages and 43 onsite guest parking spaces would be provided as part of the Project. Each home also includes a full driveway that can accommodate two additional vehicles.

Table 1-1: Summary of Impacts, Mitigation Measures, and Level of Significance from the EIR on page 1-16 has been revised as follows:

Impact BIO-2: The Project would potentially have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.	None.	Potentially Significant. <u>No Impact.</u>	Mitigation Measure BIO-1: Special Status Roosting Bats: see Impact BIO-1 Mitigation Measure BIO-2: Bat Relocation: see Impact BIO-1 Mitigation Measure BIO-3: Nesting Birds: See Impact BIO-1 <u>None.</u>	Less than Significant. <u>No Impact.</u>
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Mitigation Measure TR-1 on page 1-5 has been revised as follows:

MM TR-1: Provide Ride Share Program (CAPCOA TRT-3). The Project applicant/developer shall create a website in multiple languages describing and coordinating the following carpooling/ridesharing programs for the Project site that shall be made available to the greater community. The website shall function as a resource for encouraging and implementing VMT reduction measures by providing one consolidated location for people to connect with others within the community. The website shall be managed and maintained by the homeowners association (HOA) and property management company for the Project. The website shall encourage and facilitate ridesharing by providing a means for community members to be matched with other members of the community and shall include matches for midday trips for shopping and medical appointments. The Project shall also provide carpool/vanpool loading/unloading area and parking spaces near the main open space area to discourage the use of single occupancy automobiles. The Project Applicant shall submit a memorandum to Public Works for review and approval detailing the metrics that will be used to measure program participation and the expected frequency of the reporting prior to final map recordation. The Project shall implement the websites and programs prior to certificate of occupancy. A bond shall be required prior to final map recordation to guarantee these items are completed.

Chapter 3, Project Description

Section 3.7 Description of the Project, paragraph 1 on page 3-13, has been revised as follows:

The proposed Project includes Project Number PRJ2020-001386, ~~Vesting~~-Tentative Tract Map Number 83183 (RPPL2020004447), Conditional Use Permit Number RPPL2021005384, and Environmental Assessment Number RPPL2020004450. The Project applicant would demolish the existing buildings on the site (the Griswold School) and associated accessory structures and develop the site with 68 detached residential condominium units, two common open space areas with landscaping totaling 35,780 square feet, stormwater infrastructure, private driveways and fire lanes, and 179 parking spaces. The proposed Project would have a density of approximately 7.15 dwelling units per acre.

Chapter 4.0, Transportation

Existing Transit Service, page 4-2 has been revised as follows:

The Project site is currently served by Foothill Transit, which serves 22 different cities via 39 existing bus lines between Downtown Los Angeles and southwest San Bernardino County. The existing Foothill Transit Line 190 would likely serve the proposed Project as it runs along San Bernardino Road with an existing bus stop in front of the Project. The transit frequency at these stops are approximately every 20 minutes. Line 190 serves El Monte, Baldwin Park, Covina, and Pomona. Additionally, existing Foothill Transit Line 185 runs along Irwindale Avenue with stops located near the intersection of Irwindale Avenue and San Bernardino Avenue, less than a quarter mile away from the Project site. The transit frequency at these stops are approximately every 3-10 minutes. Line 185 serves Hacienda Heights, Industry, La Puente, West Covina, Irwindale, and Azusa. The Metrolink also runs just north of the site (San Bernardino Line) and has stops in Baldwin Park and Covina approximately 1.8 and 2.4 miles from the Project site, respectively.

Chapter 5.1, Transportation

Existing Transit Service, page 5.1-5 has been revised as follows:

The Project site is currently served by Foothill Transit, which serves 22 different cities via 39 existing bus lines between Downtown Los Angeles and southwest San Bernardino County. The existing Foothill Transit Line 190 would likely serve the proposed Project as it runs along San Bernardino Road with an existing bus stop in front of the Project. The transit frequency at these stops are approximately every 20 minutes. Line 190

serves El Monte, Baldwin Park, Covina, and Pomona. Additionally, existing Foothill Transit Line 185 runs along Irwindale Avenue with stops located near the intersection of Irwindale Avenue and San Bernardino Avenue, less than a quarter mile away from the Project site. The transit frequency at these stops are approximately every 3-10 minutes. Line 185 serves Hacienda Heights, Industry, La Puente, West Covina, Irwindale, and Azusa.

Mitigation Measure TR-1 on page 5.1-13 has been revised as follows:

MM TR-1: Provide Ride Share Program (CAPCOA TRT-3). The Project applicant/developer shall create a website in multiple languages describing and coordinating the following carpooling/ridesharing programs for the Project site that shall be made available to the greater community. The website shall function as a resource for encouraging and implementing VMT reduction measures by providing one consolidated location for people to connect with others within the community. The website shall be managed and maintained by the homeowners association (HOA) and property management company for the Project. The website shall encourage and facilitate ridesharing by providing a means for community members to be matched with other members of the community and shall include matches for midday trips for shopping and medical appointments. The Project shall also provide carpool/vanpool loading/unloading area and parking spaces near the main open space area to discourage the use of single occupancy automobiles. The Project Applicant shall submit a memorandum to Public Works for review and approval detailing the metrics that will be used to measure program participation and the expected frequency of the reporting prior to final map recordation. The Project shall implement the websites and programs prior to certificate of occupancy. A bond shall be required prior to final map recordation to guarantee these items are completed.

Chapter 6.0, Other CEQA Considerations

Impact BIO-1, page 6-10 has been revised as follows:

BIO-1 Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

As discussed in the Initial Study, which is included as Appendix A herein, and as demonstrated by the Biological Constraints Analysis, included as Appendix C, at the time the NOP was issued, the Project site was developed with six buildings that are surrounded by paved surfaces with grass turf on the northern portion of the site. Ornamental trees are scattered throughout site. The Project site is located within an urbanized area. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) are known to occur on or adjacent to the site. The existing trees on the site have the potential to provide habitat for nesting migratory birds. Many of these trees would be removed during construction. Therefore, the proposed project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA and California Fish and Game Code, could result in a potentially significant impact if requirements of the MBTA and California Fish and Game Code are not followed. Therefore, implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3 would ensure compliance with federal and State regulations and would require a roosting bat and nesting bird survey to be conducted prior to the commencement of construction during roosting and nesting season, which would reduce potential impacts related to nesting avian species and native wildlife nursery sites to a less than significant level. Therefore, the Project would not result in a

~~substantial adverse effect, either directly or through habitat modification, to candidate, sensitive, or special status species and impacts would be less than significant.~~

RECREATION, page 6-55 has been revised as follows:

REC-3 Would the Project interfere with regional trail connectivity?

The proposed Project would not interfere with regional open space connectivity. There are no regional trails within the project vicinity. The recreational areas provided by the proposed project would not interfere with any regional open space connectivity. Therefore, project impacts related to open space connectivity would not occur.

Impact UT-4, page 6-61 has been revised as follows:

A majority of the solid waste from the unincorporated area of Los Angeles County, where the Project site is located, that was disposed of in landfills, went to the Sunshine Canyon Landfill. The Sunshine Canyon Landfill is permitted to accept 12,100 tons per day of solid waste and is permitted to operate through October 2037. In 2021, the facility received an average of 7,830 tons per day. Thus, the facility had additional capacity of 4,270 tons per day (CalRecycle 2021). Project construction would generate solid waste for landfill disposal in the form of demolition debris from the existing buildings and infrastructure that would be removed from the site. Demolition would result in 3,715 tons of debris. However, Section 5.408.1 of the 2019 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the demolition and construction solid waste that would be disposed of at the landfill would be approximately 1,300 tons of debris. As the ~~Sunshine CanyonMid-Valley Sanitary~~ Landfill had additional capacity of ~~4,2702,500~~ tons per day, the facility would be able to accommodate the addition of solid waste during construction of the proposed Project. Based on the default CalEEMod solid waste generation rate of 0.41 ton per year per resident, the 262 residents are estimated to generate 107.42 tons of solid waste per year (or 2.07 tons per week). Overall, operation of the Project is anticipated to generate 2.07 tons (4,140 pounds) of solid waste per week. As Sunshine Canyon Landfill had additional capacity of 4,270 tons per day tons per day, the facility would be able to accommodate the addition of 4,140 pounds of solid waste per week from operation of the proposed Project. Thus, impacts related to solid waste generation and landfill capacity or conflict with federal, state, and local regulations related to solid waste would be less than significant.

Cumulative Utilities and Service Systems, page 6-63 has been revised as follows:

Solid Waste: The geographic scope of cumulative analysis for landfill capacity is the service area for the ~~Sunshine CanyonMid-Valley Sanitary~~ Landfill, which serves the Project site. The projections of future landfill capacity based on the entire projected waste stream going to these landfills is used for cumulative impact analysis. The ~~Sunshine CanyonMid-Valley Sanitary~~ Landfill is permitted to accept ~~12,1007,500~~ tons per day of solid waste and is permitted to operate through ~~October 2037April 2033~~. In ~~2021December 2019~~, the facility received an average of ~~7,8305,000~~ tons per day. Thus, the facility had additional capacity of ~~4,2702,500~~ tons per day (CalRecycle). The 0.29 tons of solid waste per day from operation of the Project would represent approximately 0.01 percent of ~~Sunshine CanyonMid-Valley Sanitary~~ Landfill's daily remaining capacity. Therefore, the landfill would have sufficient capacity to serve the Project and the increase in solid waste from full buildout of the Project. Cumulative impacts would be less than significant.

Chapter 4. Mitigation Monitoring and Reporting Program

4.1 Introduction

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report has been certified which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "...reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (CEQA, Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures are successfully implemented for the Griswold Residential Project (Project). The County of Los Angeles is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

4.2 Mitigation Monitoring and Reporting Program

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program required to be implemented by the County for the Griswold Residential Project. The table identifies the Project Design Features; Plans, Programs, or Policies; and Mitigation Measures required by the County to mitigate or avoid significant adverse impacts associated with the implementation of the Project, the timing of implementation, and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As individual Project Design Features; Plan, Program, or Policies; and Mitigation Measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

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**TABLE 4-1: MITIGATION MONITORING AND REPORTING PROGRAM
THE GRISWOLD RESIDENTIAL PROJECT EIR**

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
AIR QUALITY			
<p>PPP AQ-1: SCAQMD Rule 403. The following measures shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 403:</p> <ul style="list-style-type: none"> • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less. 	In construction plans and specifications. Prior to grading and building permits.	County of Los Angeles Department of Public Works/Public Health	
<p>PPP AQ-2: SCAQMD Rule 1113. The following measure shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 1113. The project shall only use “Low-Volatile Organic Compounds (VOC)” paints (no more than 50 gram/liter of VOC) consistent with SCAQMD Rule 1113.</p>	In construction plans and specifications. Prior to building permits.	County of Los Angeles Building & Safety Division	
<p>PPP AQ-3: SCAQMD Rule 445. The following measure shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 445. Wood burning stoves and fireplaces shall not be included or used in the new development.</p>	In construction plans and specifications. During Project operation. Prior to grading and building permits.	County of Los Angeles Building & Safety Division	
BIOLOGICAL RESOURCES			
<p>Mitigation Measure BIO-1: Special-Status Roosting Bats. To avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in tree cavities or under loose bark) or</p>	Prior to grading and/or demolition permits.	County of Los Angeles Department of Regional Planning	

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>structures that contain a hibernating bat colony, the following steps shall be taken:</p> <ul style="list-style-type: none"> a) To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season. b) If trees must be encroached during the maternity season (March 1 to September 30), or structures must be removed at any time of the year, a qualified bat specialist shall conduct a pre-construction survey to identify those trees or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats. c) Each tree or structure identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the qualified bat specialist no greater than seven (7) days prior to tree disturbance or structure removal to more precisely determine the presence or absence of roosting bats. d) If bats are not detected, but the qualified bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees or structures in a controlled manner using heavy machinery. In order to ensure the optimum warning for any roosting bats that may still be present, the trees or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees or structures may then be pushed to the ground slowly under the supervision of a bat specialist. Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sawn up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape. Bats shall be allowed to escape prior to demolition of buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building. e) Maternity season lasts from March 1 to September 30. Trees or structures determined to be maternity roosts shall be left in place until the end of the maternity season or until the roost has fully fledged. A 			

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>structure containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.</p> <p>f) The bat specialist shall document all demolition monitoring activities and prepare a summary report to the County upon completion of tree disturbance or building demolition activities. If Townsend's big-eared bat is detected during pre-construction surveys, all construction-related activity shall be halted immediately and CDFW shall be notified. Work may only resume subsequent to CDFW approval.</p>			
<p>Mitigation Measure BIO-2: Bat Relocation. If confirmed occupied bat roosting habitat is destroyed, artificial bat roosts of comparable size and quality shall be constructed and maintained at a suitable undisturbed area. The design and location of the artificial bat roosts shall be determined by the bat specialist in consultation with CDFW.</p> <p>a) In exceptional circumstances, such as when roosts cannot be avoided and bats cannot be evicted by non-invasive means, it may be necessary to capture and transfer the bats to appropriate natural or artificial bat roosting habitat in the surrounding area. Bats raising young or hibernating shall not be captured and relocated. Capture and relocation shall be performed by the bat specialist in coordination with CDFW, and shall require a Scientific Collection Permit and be subject to approval by Los Angeles County Department of Regional Planning (DRP) and CDFW.</p> <p>b) A monitoring plan shall be prepared for the replacement roosts, which shall include performance standards for the use of the replacement roosts by the displaced species, as well as provisions to prevent harassment, predation, and disease of relocated bats.</p> <p>c) Annual reports detailing the success of roost replacement and bat relocation shall be prepared and submitted to Los Angeles County Department of Regional Planning and CDFW for five (5) years following relocation or until performance standards are met, whichever period is longer.</p>	<p>Prior to issuance of demolition and/or grading permits, if bat roosting habitat is found onsite.</p>	<p>County of Los Angeles Department of Regional Planning</p>	

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>Mitigation Measure BIO-3: Nesting Birds. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season, which generally runs from February 1 – August 31 (as early as January 1 for some raptors), to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.</p> <p>If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. If a protected native bird is found, the project proponent shall delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. The project proponent shall provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.</p> <p>If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she shall submit a written</p>	<p>Submittal of pre-activity field survey results report. Prior to demolition and/or grading permits.</p>	<p>County of Los Angeles Department of Regional Planning</p>	

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.</p> <p>The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if project activities damage active avian nests.</p>			
CULTURAL RESOURCES			
<p>Mitigation Measure CUL-1: Archaeological Monitoring. Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified archaeologist has been retained, from a qualified professional archaeologist meeting the Secretary of Interior's Professional Qualifications for Archaeology as defined at 36 CFR Part 61, Appendix A stating that the archaeologists have been retained and shall be present at pre-grade meetings and for all initial ground disturbing activities. The archaeologist shall provide spot check monitoring as determined necessary by the retained archaeologist.</p> <p>In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist shall be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register, plans for the treatment, evaluation, and mitigation of impacts to the find would need to occur.</p>	Prior to grading permits.	County of Los Angeles Department of Regional Planning	

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
<p>In the event a previously unrecorded archaeological deposit is encountered during construction, all activity within 50 feet of the area of discovery shall cease and the County shall be immediately notified. The archaeologist shall be contacted to flag the area in the field and shall determine if the archaeological deposits meet the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique archaeological resource (Public Resources Code 21083.2(g)).</p> <p>If the find is considered a “resource” the archaeologist shall pursue either protection in place or recovery, salvage, and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with the County. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C). If unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the developer/applicant’s expense.</p>			
<p>Mitigation Measure CUL-2: Paleontological Incidental Discoveries. Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified paleontologist has been retained and either the paleontologist, or a representative, shall be onsite if excavations penetrate the bedrock formations.</p> <p>In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The project applicant shall then inform the Los Angeles County Natural History Museum of the find and retain a qualified paleontologist. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.</p> <p>Criteria for discard of specific fossil specimens shall be made explicit by the qualified paleontologist. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery shall be applied. Actions may include recovering</p>	Prior to grading permits.	County of Los Angeles Department of Regional Planning	

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.			
Mitigation Measure CUL-3: Human Remains. If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (California Public Resources Code §5097.98). The Coroner shall determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, s/he shall contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. The MLD'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 (California Health and Safety Code §7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code §5097.98).	During grading activities or ground disturbance.	County of Los Angeles Department of Regional Planning, County Coroner, Native American Heritage Commission	
GEOLOGY AND SOILS			
PPP GEO-1: CBC Compliance. The project is required to comply with the California Building Standards Code (CBC) as included in the County Code as Title 26, to preclude significant adverse effects associated with seismic and soils hazards. As part of CBC compliance, CBC related and geologist and/or civil engineer specifications for the proposed project shall be incorporated into grading plans and building specifications as a condition of construction permit approval.	In construction plans and specifications. Prior to building permit.	County of Los Angeles Building & Safety Division	

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
HAZARDS AND HAZARDOUS MATERIALS			
PPP HAZ-1: SCAQMD Rule 1403. Prior to issuance of demolition permits, the project applicant shall submit verification to the County Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the project site. If asbestos is found, the project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District (SCAQMD) Rule 1403. Prior to issuance of demolition permits the applicant shall provide verification that the following SCAQMD Rule 1403 regulations have been taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.	Submission of asbestos survey results. Prior to demolition permit.	County of Los Angeles Building & Safety Division	
PPP HAZ-2: Lead. Prior to issuance of demolition permits, the project applicant shall submit verification to the County Building and Safety Division that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, County demolition permits shall ensure that all procedural requirements and regulations are followed for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.	Submission of lead-based paint survey results. Prior to demolition permit.	County of Los Angeles Building & Safety Division	
Mitigation Measure HAZ-1: Soils Testing Plan. Prior to issuance of a grading permit, a soils testing plan for arsenic shall be prepared by a qualified hazardous materials consultant and shall detail procedures and protocols for testing any soils that require offsite disposal. Based on testing results soils shall be transported and disposed of per California Hazardous Waste Regulations to an appropriately permitted landfill. Any soil contaminated with concentrations of arsenic exceeding 12 ppm shall be removed and transported to an appropriately permitted disposal facility prior to site grading and development activities. Should the volume of arsenic impacted soil exceed 50 cubic yards, a SCAQMD Rule 1466 permit would be required and shall be implemented during soil excavation and removal activities. Soils testing and disposal requirements shall be included within all grading permits and specifications.	In construction plans and specifications. Prior to demolition permit.	County of Los Angeles Building & Safety Division; County of Los Angeles Department of Public Health, Environmental Health Division	

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Mitigation Measure HAZ-2: Health and Safety Plan. Due to the potential for onsite soils to contain elevated levels of arsenic, a Health and Safety Plan shall be prepared in compliance with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719). The Health and Safety Plan shall address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of arsenic are encountered during grading and excavation and shall include any applicable recommendations contained in all Phase I and Phase II ESAs. The Health and Safety Plan shall have emergency contact numbers, maps to the nearest hospital, allowable worker exposure times, and mandatory personal protective equipment requirements. The Health and Safety Plan shall be signed by all workers involved in the removal of the contaminated soils to demonstrate their understanding of the risks of excavation.	Submission of Health and Safety Plan. Prior to grading permit.	County of Los Angeles Building & Safety Division; County of Los Angeles Department of Public Health, Environmental Health Division	
Mitigation Measure HAZ-3: Hazardous Waste Education. As part of the Home Buyer's package, the project Applicant/Owner shall provide new homeowners education materials on the proper management and disposal of household hazardous waste. The educational materials shall provide new homeowners with links to the County Department of Public Works' website regarding the Los Angeles County Household Hazardous Waste Collection Program and provide the addresses of permanent household hazardous waste collection centers.	Prior to certificate of Occupancy.	County of Los Angeles Building & Safety Division	
HYDROLOGY & WATER QUALITY			
PPP WQ-1: NPDES/SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the County Department of Public Works evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.	Prior to grading permit.	County of Los Angeles Building & Safety Division	

Plan, Program, Policy / Mitigation Measure	Action and Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
PPP WQ-2: LID. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Low Impact Development Plan (LID) shall be submitted to and approved by the County Department of Public Works. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize the adverse effects on receiving waters.	Prior to grading permit.	County of Los Angeles Building & Safety Division	
NOISE			
MM NOI-1: Temporary Sound Barriers and Permanent Walls. Construction plans and specifications shall require that a minimum eight-foot-high temporary sound barrier (e.g., fiberglass core sound blanket or a 0.5-inch-thick wooden panel sound wall) shall be placed on the eastern and western property lines prior to commencement of Project grading. Temporary sound blankets or sound walls shall be maintained until the permanent six-foot-high concrete masonry unit (CMU) wall that are depicted in the Wall Plan for the Project are constructed along the east and west property lines. Construction plans and specifications shall also state that stationary construction equipment shall be located a minimum of 100 feet from the property line of any offsite residence. Noise control requirements shall be noted and depicted on Project construction drawings/plans.	In construction plans and specifications. Prior to grading permit.	County of Los Angeles Building & Safety Division	
MM NOI-2: Vibration Control. The Project construction plans and specifications shall state that operation of off-road construction equipment that is 150 horsepower or greater shall not occur within 10 feet of either the east or west property lines in order to limit construction-related vibration levels at the nearby residences. Typical construction equipment that is less than 150 horsepower include backhoes, skid steers, skip loaders, and tractors, that are capable of performing all grading and excavation activities within the 10-foot-wide areas adjacent to the east and west property lines. Noise control requirements shall be noted and depicted on Project construction drawings/plans.	In construction plans and specifications. Prior to grading permit.	County of Los Angeles Building & Safety Division	

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TRANSPORTATION			
PDF TR-1: Provide Pedestrian Network Improvements (CAPCOA SDT-1). Sidewalks currently exist along the Project's frontage of San Bernardino Road and connections extend both east and west from the site to surrounding land uses. The Project includes construction of onsite, internal five-foot-wide sidewalks that will connect to the existing sidewalks along San Bernardino Road. Improvement plans for the proposed sidewalks shall be submitted to Public Works for review and approval prior to final map recordation.	Prior to certificate of Occupancy or Building Permit Final Inspection.	County of Los Angeles Building & Safety Division	
PDF TR-2: Onsite Bicycle Parking. As part of the Project design, the Project will provide bicycle parking in common areas in addition to private garages. Improvement plans shall be submitted to Public Works for review and approval prior to final map recordation. A note shall be shown on the Exhibit A map showing bicycle parking.	Prior to certificate of Occupancy or Building Permit Final Inspection.	County of Los Angeles Building & Safety Division	
PDF TR-3: Onsite Parks (inspired by CAPCOA LUT-3). The Project will construct two onsite park/open space areas that shall be made available for resident and public use. Improvement plans for the onsite open space shall be submitted to Public Works for review and approval prior to final map recordation. The signage shall include "Open to the Public" and the Street Improvement Plans shall demonstrate sidewalk accessibility. Upon completion of the Project, the open space will be conveyed to the homeowners' association formed to manage the Project ("HOA"). Any recorded instrument that references the public's use of the open space shall provide that the public's use of the open space is subject to any rules and regulations promulgated by the HOA related to the public's use of such open space and all HOA members and the general public shall comply with the rules and regulations promulgated by the HOA.	Prior to certificate of Occupancy or Building Permit Final Inspection.	County of Los Angeles Building & Safety Division	
MM TR-1: Provide Ride Share Program (CAPCOA TRT-3). The Project applicant/developer shall create a website in multiple languages describing and coordinating the following carpooling/ridesharing programs for the Project site that shall be made available to the greater community. The website shall function as a resource for encouraging and implementing VMT reduction measures by providing one consolidated location for people to connect with others within the	In operational specifications. During operations.	County of Los Angeles Building & Safety Division	

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<p>community. The website shall be managed and maintained by the homeowners association (HOA) and property management company for the Project. The website shall encourage and facilitate ridesharing by providing a means for community members to be matched with other members of the community and shall include matches for midday trips for shopping and medical appointments. The Project shall also provide carpool/vanpool loading/unloading area and parking spaces near the main open space area to discourage the use of single occupancy automobiles. The Project Applicant shall submit a memorandum to Public Works for review and approval detailing the metrics that will be used to measure program participation and the expected frequency of the reporting prior to final map recordation. The Project shall implement the websites and programs prior to certificate of occupancy. A bond shall be required prior to final map recordation to guarantee these items are completed.</p>			
TRIBAL CULTURAL RESOURCES			
<p>MM TCR-1: Native American Monitoring. Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.</p> <p>A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related</p>	<p>Submission of Tribal Monitoring Agreements. Prior to grading permits.</p>	<p>County of Los Angeles Department of Regional Planning</p>	

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<p>materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.</p> <p>D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.</p> <p>E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.</p>			
<p>MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects.</p> <p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain</p>	<p>Prior to grading permit. During grading activities and ground disturbance.</p>	<p>County of Los Angeles Department of Regional Planning</p>	

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<p>halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.</p> <p>C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).</p> <p>D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)</p> <p>E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.</p> <p>F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>			
<p>MM TCR-3: Procedures for Burials and Funerary Remains.</p> <p>A. As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.</p>	<p>Prior to grading permit. During grading activities and ground disturbance.</p>	<p>County of Los Angeles Department of Regional Planning</p>	

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<p>B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.</p> <p>C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.</p> <p>D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed, as described in item E.</p> <p>E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.</p> <p>F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.</p>			

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G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.			