



414 South San Gabriel Boulevard Project **Initial Study/Mitigated Negative Declaration**

Prepared for:
City of San Gabriel

Prepared by:
Michael Baker International

Michael Baker
INTERNATIONAL

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**FINAL
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

414 South San Gabriel Project

State Clearinghouse No. 2020080157

Lead Agency:



CITY OF SAN GABRIEL
425 South Mission Drive
San Gabriel, California 91776
Contact: Mr. Matt Chang
626.308.2806

Prepared by:

MICHAEL BAKER INTERNATIONAL
5 Hutton Centre Drive, Suite 500
Santa Ana, California 92707
Contact: Ms. Alicia Gonzalez
909.974.4933

September 2020

JN 177570

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1.0 INTRODUCTION

The 414 South San Gabriel Boulevard Project (project) proposes the construction of a climate-controlled self-storage facility and executive artists space on an approximately 1.75-gross acre site. The project would construct a 199,358-square foot building with approximately 190,232 square feet of climate-controlled self-storage and approximately 9,126 square feet of executive artists space. The climate controlled self-storage facility would include a 1,000-square foot ground floor rental office. The executive artist space would include a 1,000-square foot community arts space fronting South San Gabriel Boulevard. The proposed structure would be four stories with one level of subterranean self-storage space along South San Gabriel Boulevard, while a partial fifth story with one level of subterranean self-storage space would be provided along Commercial Avenue and Gladys Avenue. Project approval would require a Zone Change/Planned Development, Tentative Parcel Map, Precise Plan of Design, Master Sign Plan, issuance of applicable Grading and Building Permits, and CEQA Clearance.

The Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse No. 2020080157) was made available for public review and comment pursuant to CEQA Guidelines Section 15073. The public review commenced on August 12, 2020 and concluded on September 11, 2020.

Due to the COVID-19 pandemic, facilities including City Hall and the San Gabriel Public Library have been closed until further notice. The IS/MND was made available for public review on the City's website at <https://www.sangabrielcity.com/731/Current-Projects-Programs>. Alternatively, agencies and the public were directed to call or email the City staff to make arrangements to view the IS/MND and/or supporting materials in person.



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2.0 RESPONSE TO COMMENTS

During the public review period, comment letters were received on the IS/MND from interested public agencies, organizations, and individuals. The following is a list of commenters on the IS/MND during the public review period.

Comment Letter No.	Person, Firm, or Agency	Letter Dated
1	State Clearinghouse and Planning Unit Governor's Office of Planning and Research Scott Morgan, Director	September 17, 2020
2	Sanitation Districts of Los Angeles County Adriana Raza, Customer Service Specialist	August 18, 2020
3	Senya Lubisich, Resident	September 11, 2020
4	California Department of Transportation District 7 Miya Edmonson, IGR/CEQA Branch Chief	September 11, 2020

Although the CEQA Guidelines do not require a lead agency to prepare written responses to comments received (see CEQA Guidelines Section 15088), the City of San Gabriel has elected to prepare the following written responses with the intent of conducting a comprehensive and meaningful evaluation of the proposed project. The number designations in the responses are correlated to the bracketed and identified portions of each comment letter.

COMMENT LETTER 1

414 South San Gabriel Boulevard Project

Summary

SCH Number	2020080157
Lead Agency	San Gabriel, City of (<i>City of San Gabriel</i>)
Document Title	414 South San Gabriel Boulevard Project
Document Type	MND - Mitigated Negative Declaration
Received	8/11/2020
Project Applicant	San Gabriel Self Storage Partners, LLC
Present Land Use	The project site is currently developed with six single-story commercial buildings totaling approximately 11,691 square feet and surface parking.

Document Description	The 414 South San Gabriel Project (project) proposes the construction of a climate-controlled self-storage facility and executive artists space on an approximately 1.75-gross acre site. The project would construct a 199,358-square foot building with approximately 190,232 square feet of climate-controlled self-storage and approximately 9,126 square feet of executive artists space. The climate controlled self-storage facility would include a 1,000-square foot ground floor rental office. The executive artist space would include a 1,000-square foot community arts space fronting South San Gabriel Boulevard. The proposed structure would be four stories with one level of subterranean self-storage space along South San Gabriel Boulevard, while a partial fifth story with one level of subterranean self-storage space would be provided along Commercial Avenue and Gladys Avenue. Project approval would require a Zone Change/Planned Development, Development Agreement, Tentative Parcel Map, Precise Plan of Design, Master Sign Plan, issuance of applicable Grading and Building Permits, and CEQA Clearance.
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Contact Information	<div>Matt Chang</div> <div>City of San Gabriel</div> <div>425 South Mission Drive</div> <div>San Gabriel, CA 91776</div> <div>Phone : (626) 308-2806</div> <div>mchang@sgch.org</div>
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Location

Coordinates	34°50'36"N 118°25'52.2"W
Cities	San Gabriel
Counties	Los Angeles
Regions	Citywide
Cross Streets	South San Gabriel Boulevard/Commercial Avenue
Zip	91776
Total Acres	1.75
Jobs	38
Parcel #	Various
State Highways	SR-19

Railways	UPRR
Airports	N/A
Schools	Various
Waterways	Rubio Wash and Alhambra Wash
Township	1S
Range	12W
Section	12
Base	SBM

Notice of Completion

Review Period Start	8/12/2020
Review Period End	9/11/2020
Development Type	Commercial (199,358 Sq. Ft., 1.75 Acres, 38 Employees)
Local Action	Planned Unit Development Rezone Grading Permit Other Action Development Agreement, Tentative Parcel Map, Precise Plan of Design, Master Sign Plan, Building Permits
Project Issues	Aesthetic/Visual Agricultural Land Air Quality Archaeologic-Historic Biological Resources Drainage/Absorption Economics/Jobs Flood Plain/Flooding Forest Land/Fire Hazard Geologic/Seismic Greenhouse Gas Emissions Job Generation Minerals Noise Population/Housing Balance Public Services Recreation/Parks Schools/Universities Septic System Sewer Capacity Soil Erosion/Compaction/Grading Solid Waste Toxic/Hazardous Traffic/Circulation Tribal Cultural Resources Vegetation Water Quality Water Supply Wetland/Riparian Wildlife Growth Inducing Land Use Cumulative Effects Other Energy and Wildfire
Reviewing Agencies	California Air Resources Board California Department of Conservation California Department of Fish and Wildlife, South Coast Region 5 California Department of Parks and Recreation California Department of Water Resources California Highway Patrol California Native American Heritage Commission California Natural Resources Agency California Public Utilities Commission California Regional Water Quality Control Board, Los Angeles Region 4 California State Lands Commission Department of Toxic Substances Control Office of Historic Preservation San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy State Water Resources Control Board, Division of Water Quality California Department of Transportation, District 7

1-1

Attachments

Environmental Document

414 S San Gabriel Blvd_NOI_081020	PDF	95 K
414 S San Gabriel Blvd_SCH Summary Form_081120	PDF	196 K
414 S San Gabriel_Public Review Draft ISMND	PDF	28427 K
Appendix A_Shade-Shadow Study	PDF	2540 K
Appendix B_AQ_GHG_EN	PDF	4623 K
Appendix C_Cultural Resources Survey	PDF	5491 K
Appendix D_Geotechnical Investigation	PDF	10912 K
Appendix E_Hazardous Material Documentation	PDF	57336 K
Appendix F_Hydrology Analysis and LID Plan	PDF	58064 K
Appendix G_Acoustical Assessment	PDF	117 K
Appendix H_Transportation Impact Study and VMT Analysis	PDF	8169 K

NOC

414 S San Gabriel Blvd_NOC_081120	PDF	734 K
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State Comments

2020080157_Caltrans Comment	PDF	246 K
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please visit [OPR's Accessibility Site](#).



Response No. 1

State Clearinghouse and Planning Unit
Governor's Office of Planning and Research
September 18, 2020

- 1-1 This comment includes copy of the online State Clearinghouse CEQAnet database summary for the project (SCH No. 2020080157). The summary acknowledges that public review started on August 12, 2020 and ended on September 11, 2020. During the public review period, one State agency letter was received by the California Department of Transportation (Caltrans). Refer to Comment Letter No. 4.



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

August 18, 2020

Ref. DOC 5868277

Mr. Matt Chang, Senior Planner
Planning Division
City of San Gabriel
425 South Mission Drive
San Gabriel, CA 91776

Dear Mr. Chang:

NOI Response for 414 South San Gabriel Boulevard Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on August 13, 2020. The proposed project is located within the jurisdictional boundary of District No. 2. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Joint Outfall B Unit 1J Trunk Sewer, located in San Gabriel Boulevard at Marshall Street. The Districts' 21-inch diameter trunk sewer has a capacity of 7.7 million gallons per day (mgd) and conveyed a peak flow of 3.3 mgd when last measured in 2012. 2-1
2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd, or the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an average flow of 21.7 mgd. 2-2
3. The expected increase in average wastewater flow from the project site, described in the notice as 190,232 square feet of climate controlled self-storage and 9,126 square feet of executive artist space, is 6,577 gallons per day, after the structures on the project site are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link. 2-3
4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee will be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. 2-4

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

2-6

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsdc.org.

Very truly yours,



Adriana Raza

Customer Service Specialist
Facilities Planning Department

AR:ar



Response No. 2

Los Angeles County Sanitation Districts, Facilities Planning Department
Adriana Raza, Customer Service Specialist
August 18, 2020

- 2-1 This comment provides a general introduction and states that the project is located within District No. 2 of the Los Angeles County Sanitation Districts (Districts). Responses to specific comments are provided below.
- 2-2 The commenter states that wastewater originating from the project site would discharge to a local sewer line, not maintained by the Districts, for conveyance to the Districts' Joint Outfall B Unit 1J Trunk Sewer located in San Gabriel Boulevard at Marshall Street. This clarification has been made to pages 2-8 and 4.19-2 of the Draft IS/MND and is reflected below and in Section 3.0, *Errata*, of the Final IS/MND.

Section 2.0, Project Description, Page 2-8

- Sewer. The Sanitation Districts of Los Angeles County (Districts) would provide sewer services to the project site. The project would install a 6-inch sewer line to connect to an existing locally maintained Districts-owned sewer mainline aligned in South San Gabriel Boulevard for conveyance to the Districts' Unit 1J Trunk Sewer located in San Gabriel Boulevard at Marshall Street.

Section 4.19, Utilities and Services Systems, Page 4.19-2

Wastewater Treatment

The Sanitation Districts of Los Angeles County (Districts) would provide sewer services to the project site. The project would install a 6-inch sewer line to connect to an existing locally maintained Districts-owned sewer mainline aligned in South San Gabriel Boulevard for conveyance to the Districts' Unit 1J Trunk Sewer located in San Gabriel Boulevard at Marshall Street. The Districts' 21-inch diameter trunk sewer has a capacity of 7.7 million gallons per day (mgd) and conveyed a peak flow of 3.3 mgd when last measured in 2012. Wastewater generated by the proposed project would be treated at the Joint Water Pollution Control Plant located in the City of Carson or the Los Coyotes Water Reclamation Plant located in the City of Cerritos. The Joint Water Pollution Control Plan has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd, while the Los Coyotes Water Reclamation Plant has a capacity of 37.5 mgd and currently processes an average flow of 21.7 mgd. Wastewater generated in the City of San Gabriel is treated by either the Districts' Whittier Narrows Water Reclamation Plant (WRP) located near the City of South El Monte, the Los Coyotes WRP located in the City of Cerritos, or the San Jose Creek WRP located adjacent to the City of Industry. The Whittier Narrows WRP has a capacity of 15 million gallons per day (mgd); the Los Coyotes WRP has a capacity of 37.5 mgd; and the San Jose Creek WRP has a capacity of 100 mgd. All three WRPs belong to the

¹ Written Correspondence: Adriana Raza, Customer Service Specialist, Sanitation Districts of Los Angeles County, August 18, 2020.



Districts' integrated network of facilities known as the Joint Outfall System.² Biosolids and wastewater flows that exceed the capacity of the these upstream WRPs are diverted to and treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 mgd.

As a self-storage facility with executive artist space, the project is not anticipated to generate substantial sources of additional wastewater above existing conditions. Based on correspondence with the Districts, the project's expected average wastewater flow would be 6,577 gallons per day (gpd) after the structures on the project site are demolished. This represents less than one percent of the Unit 1J Trunk Sewer's 7.7 mgd capacity, Joint Water Pollution Control Plant's 400 mgd capacity, and Los Coyotes Water Reclamation Plan's 37.5 mgd capacity. Nonetheless, the proposed project would be required to pay sewer connection fees and ongoing user fees. In addition, SGMC Section 154.002, *Sanitary Sewer Impact Fee*, imposes a development impact fee on all new development in the City to fund a project's fair share of costs to upgrade the City's sewer system. As the project is consistent with the land use designation for the area, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities. Payment of development impact fee, standard sewer connection fees, and ongoing user fees would ensure the project's impacts on existing wastewater facilities are adequately offset.

These changes provide a minor update, correction, or clarification and do not represent "significant new information" as defined in CEQA Guidelines Section 15088.5 and would not result in any new or substantially greater significant impacts as compared to those identified in the Draft IS/MND.

- 2-3 The commenter states that the wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 261.1 mgd, or the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an average flow of 21.7 mgd. This clarification has been made to pages 2-8 and 4.19-2 of the Draft IS/MND and is reflected in Response to Comment 2-2 and in Section 3.0 of the Final IS/MND. This change provides a minor update, correction, or clarification and does not represent "significant new information" as defined in CEQA Guidelines Section 15088.5 and would not result in any new or substantially greater significant impacts as compared to those identified in the Draft IS/MND.
- 2-4 The commenter states that the project's expected average wastewater flow would be 6,577 gallons per day (gpd) after the structures on the project site are demolished. This clarification has been made to 4.19-2 of the Draft IS/MND and is reflected in Response to Comment 2-2 and in Section 3.0 of the Final IS/MND. This change provides a minor update, correction, or clarification and does not represent "significant new information" as defined in CEQA Guidelines Section 15088.5 and would not result in any new or substantially greater significant impacts as compared to those identified in the Draft IS/MND.

²—Los Angeles County Sanitation Districts, *Joint Outfall System Water Reclamation Plants*, https://www.lacsd.org/services/wastewater/wwfacilities/joint_outfall_system_wrp/default.asp, accessed March 31, 2020.



- 2-5 The commenter states that the Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This comment is acknowledged. As stated on page 4.19-2, paragraph 3, of the Draft IS/MND, the project would be subject to payment of standard sewer connection fees and ongoing user fees.
- 2-6 The commenter notes that the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecasts adopted by the Southern California Association of Governments (SCAG). As discussed in Draft IS/MND Section 4.14, *Population and Housing*, SCAG growth forecasts estimate the City's population to reach 46,900 persons by 2040, representing a total increase of 6,800 persons between 2012 and 2040. The project would employ up to 38 employees and tenants. The project's anticipated population increase (conservatively assumed at 120 persons) would represent a 0.3 percent increase over the City's anticipated 2040 population, which would be considered less than significant. Thus, although the project would result in indirect population growth through employee and tenant generation, the proposed project would not result in significant exceedance of projected growth anticipated by SCAG (Draft IS/MND page 4.14-1). Further, as concluded in Draft IS/MND page 4.3-2, the project would not conflict with population, housing, and employment growth projections in the 2016 *Air Quality Management Plan* (AQMP), *Comprehensive General Plan of the City of San Gabriel, California* (General Plan), SCAG's Growth Management Chapter of the Regional Comprehensive Plan (RCP), and SCAG's 2016-2040 *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS). The determination of project consistency with the 2016 AQMP is primarily concerned with the long-term influence of a project on Basin air quality. The project would not result in long-term impacts on the region's ability to meet State and Federal air quality standards. As discussed above, the proposed project would not conflict with the population, housing, and employment growth projections in the 2016 AQMP, nor the goals and policies of the General Plan, SCAG's RCP, and SCAG's RTP/SCS. The Draft IS/MND determined that air quality impacts would be less than significant in this regard.

The comment letter does not constitute a guarantee of wastewater services but rather that the Districts intend to provide service up to the levels that are legally permitted and to inform the Applicant of existing capacities and any proposed expansions of the Districts' facilities. This comment is acknowledged, and no further response is required.

From: senya lubisich <senyalubisich@gmail.com>
Sent: Friday, September 11, 2020 3:20 PM
To: Matt Chang <mchang@SGCH.ORG>
Subject: 414 S. San Gabriel Blvd - MND Comments

Hello Matt,

I wanted to submit the following comments regarding the MND proposed for the 414 S. San Gabriel Blvd. project. 3-1

I want to reiterate the importance of Native American Monitoring as proscribed in the MND - TCR-1. I would like to ensure that beyond pavement removal, that monitoring is part of the entire site preparation. As we know from active excavation sites, the depth of artifacts can be within 24 inches of the surface. No clearing of land on the site should occur without the presence of a monitor who trained to identify archeological elements. 3-2

I dispute the finding of no significant historical resources. The study cited that CHRIS did not indicate buildings that were eligible on the National, State, or local register. I believe that the determination of no local significance is premature given the fact that the city does not have a Historic Context Statement or a completed inventory of significant sites. The History of San Gabriel written by Mary Ruth Hayes speaks to the development of industry in San Gabriel along the corridor of the railroad tracks. The brick buildings that surround this site are evidence of the expansion of industry from the 1920s through the 1940s. In particular, I would call attention to the building that will be surrounded by this project: 424 S. San Gabriel Blvd. This building, taken in tandem with the "Spanish Galleon" building located at 445 S. San Gabriel articulates the development of San Gabriel's industrial corridor. This industrial corridor came to include notable sites, such as the Whamo factory, which have received scant attention and interpretation in the city's commercial history. 3-3

I would ask that attention be given to the design of the project as an infill project. The massing of the proposed project should appropriately step its increase from the modest brick building at 424 S. San Gabriel and that the materials used in the project design also complement the character of the brick structures. 3-4

Lastly, as a point of process, I wish to state that I find the practice of bundling approvals - MND, PDA, etc. problematic and think that the community would be better served if the various processes were done sequentially rather than in tandem. 3-5

Best,
 Senya Lubisich
 116 N. Del Mar Ave.
 San Gabriel, CA 91775



Response No. 3

Senya Lubisich, Resident
September 11, 2020

- 3-1 This comment provides a general introduction. Responses to specific comments are provided below.
- 3-2 The commenter requests that Mitigation Measure TCR-1 is revised to ensure Native American Monitoring is included during the entire site preparation phase, and that no clearing of land on the project site occurs without the presence of a monitor who is trained to identify archaeological elements. As discussed in Draft IS/MND Section 4.18, *Tribal Cultural Resources*, Mitigation Measure TCR-1 would ensure that a Tribal monitor is present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities were defined by the Gabrieleño Band of Mission Indians-Kizh Nation as “activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area” during the project’s Assembly Bill 52 consultation process; refer to Mitigation Measure TCR-1 on page 4.18-2 of the Draft IS/MND.
- 3-3 The commenter disputes the Draft IS/MND’s conclusion of no significant historical resources, stating that the determination of no local significance for on-site buildings is premature since the City does not have a Historical Context Statement or a completed inventory of significant sites. The conclusions presented in Section 4.5, Cultural Resources, of the Draft IS/MND are based on the findings of the *Cultural Resources Survey for the 414 South San Gabriel Project, City of San Gabriel, Los Angeles County, California* (Cultural Resources Survey), prepared by Anza Resources Consultants (dated June 2020). The Cultural Resources Survey was prepared in accordance with the California Environmental Quality Act (CEQA) statutes and guidelines, as well as the City of San Gabriel’s (2004) Cultural Resources chapter (Chapter 11) of the General Plan and Chapter 153 of the San Gabriel Municipal Code (SGMC).

As discussed on page 4.5-1 of the Draft IS/MND, a records search of the California Historical Resources Information System (CHRIS) was provided by the South Central Coastal Information Center (SCCIC) on May 26, 2020. The search was conducted to identify previously recorded cultural resources and previously conducted cultural resources studies within a 0.5-mile radius of the project site. The CHRIS search also included a review of the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search also included a review of all available historic United States Geological Survey (USGS) 7.5-, 15-, and 30-minute quadrangle maps.

Other background research conducted for the Cultural Resources Survey included a review of the General Plan, Historic Sanborn Maps and aerial photographs, and a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC).



In addition, on April 14, 2020, an intensive historic resources field survey was conducted on the project site. The field survey consisted of a visual inspection of all historic-period built environment features on the property, to assess their overall condition and integrity, and to identify and document any potential character-defining features or alterations.

Based on the records search, background research, and historic resources field survey, only three commercial buildings over 45 years of age were identified within the project site: 414 South San Gabriel Boulevard, 420 South San Gabriel Boulevard, and 815 Commercial Avenue. According to CEQA, a resource shall be considered historically significant if it meets any of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

As concluded in the Draft IS/MND Section 4.5, the three existing commercial buildings over 45 years of age are not considered a historical resource under CEQA since none 1) are associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; 2) are associated with the lives of persons important in our past; 3) embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or 4) have yielded, or may be likely to yield, information important in prehistory or history. Furthermore, none of these buildings are found to be contributors to any CRHR-eligible historic district. Thus, the City affirms the Draft IS/MND's conclusion that development of the proposed project would not result in impacts to historic resources. No impacts would occur in this regard.

The existing buildings at 424 and 445 South San Gabriel Boulevard are not located within the project boundaries and would not be impacted by project implementation. The existing building at 445 South San Gabriel Boulevard is located one block to the south, across South San Gabriel Boulevard and a railroad right-of-way. As shown on Draft IS/MND Exhibit 2-3, Conceptual Site Plan, the project has been designed such that an internal drive aisle, surface parking lot, and landscaping are provided near 424 South San Gabriel Boulevard, while the proposed L-shaped building would be sited along the site's northern and eastern boundary. No impacts would occur in this regard.

- 3-4 The commenter requests that special attention be given to the design of the project and that the massing is sensitive to the brick building at 424 South San Gabriel. The commenter also requests that the materials used in the project design complement the character of the brick building at 424 South San Gabriel. As discussed in Response to Comment 3-3, the project has been designed such that an internal drive aisle, surface parking lot, and landscaping are provided near the brick building at 424 South San Gabriel, while the proposed L-shaped building would be sited along the site's northern and eastern boundary (approximately 38 feet and six inches at



its closest point from the building at 424 South San Gabriel). As an infill development project, the proposed project has been thoughtfully designed to be compatible with adjacent commercial and industrial uses; refer to Table 4.11-1, *General Plan Land Use and Economic Development Consistency Analysis*, of the Draft IS/MND. Similar to early buildings in the vicinity, the proposed project features an industrial character, expressed through its rectangular massing, regularly spaced bays of metal windows, materials palette (which includes exposed brick and CMU block in a similar hue to the exterior brick at 424 South San Gabriel), metal awnings, and horizontal decorative elements. Ornamental landscaping would be installed along the site perimeter along South Gladys Avenue, Commercial Avenue, and South San Gabriel Boulevard; refer to Exhibit 2-5, *Conceptual Landscape Plan*, of the Draft IS/MND. Planting materials may include but would not be limited to a mix of trees, shrubs, and accents, including fruitless/pollenless olive, willow acacia, Texas mountain laurel, orange jubilee, red yucca, India Hawthorne, and day lily. The site is also physically separated from adjacent uses by South Gladys Avenue to the east, Commercial Avenue to the south, and South San Gabriel Boulevard to the west. Pursuant to SGM Section 153.355, *Evaluation Criteria*, upon consideration of the project's Precise Plan of Design (PPD) application, the City of San Gabriel Community Development Director, Design Review Commission, or City Council, on appeal, would ensure that the project site plan, architecture, and landscape design provide proper transition between the project site and adjoining properties, including proper streetscape, architectural scale, massing, proportion and harmony; landscape palette, sound and vibration control, buffering, privacy protections; public improvements, and sign controls necessary to improve the quality of the streetscape. By complying with the City's design review process, project implementation would be appropriately and sensitively buffered from its neighbors, including the brick building at 424 South San Gabriel Boulevard.

- 3-5 The commenter requests that the approval processes for the project environmental documentation be approved sequentially rather than in tandem. It is noted that, in accordance with State law, Section 2.6, *Permits and Approvals*, of the Draft IS/MND includes a description of the City's discretionary authority over the project as well as anticipated permits and approvals. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. Therefore, no further response is warranted.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-0475
 FAX (213) 897-1337
 TTY 711
 www.dot.ca.gov



Making Conservation
 a California Way of Life.

9/11/2020

Governor's Office of Planning & Research

September 10, 2020

Sep 10 2020

Matt Chang
 City of San Gabriel
 Community Development Department
 Planning Division
 425 South Mission Drive
 San Gabriel, CA 91776

STATE CLEARINGHOUSE

RE: 414 South San Gabriel Boulevard Project –
 Mitigated Negative Declaration (MND)
 SCH # 2020080157
 GTS # 07-LA-2020-03337
 Vic. LA-164/PM: 6.9

Dear Matt Chang:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The project proposes a 199,358-square foot building with approximately 190,232 square feet of self-storage and 9,126 square feet of executive artists space on a 1.75-gross acre site. The self-storage facility would include a 1,000-square foot ground floor rental office. The executive artist space would include a 1,000-square foot community arts space fronting South San Gabriel Boulevard. The proposed structure would be four stories with one level of subterranean self-storage space along South San Gabriel Boulevard, while a partial fifth story with one level of subterranean self-storage space would be provided along Commercial Avenue and Gladys Avenue. The City of San Gabriel is the Lead Agency under the California Environmental Quality Act (CEQA).

4-1

The project is located approximately 4,500 feet away from the State Route 164 (SR-164) and Broadway intersection. It is also located approximately 2 miles away from the Interstate 10 (I-10) and San Gabriel Boulevard interchange. From reviewing the MND, Caltrans has the following comments:

- As stated in the MND, Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020.
- In the MND, both a Level of Service (LOS) analysis and a VMT analysis were provided. Since the SB 743 deadline has passed, Caltrans has reviewed this project primarily from a VMT perspective.
- Caltrans concurs that the project's self-storage component can be considered local-serving retail and thus presumed to have a less than significant transportation impact, because it would generate substantially less trips than a typical 50,000 square foot retail establishment and would improve the proximity of self-storage facilities for residents in northern San Gabriel, San Marino, Temple City and Arcadia. These effects would reduce VMT.
- Also, while Caltrans commends the City for adopting VMT as a metric to evaluate transportation impacts, Caltrans also strongly recommends that the City to update its *Traffic*

4-2

Study Guidelines for Development Projects in the City of San Gabriel so that VMT is the primary basis for determining significant transportation impacts of future projects in the City.

- For more information on determining transportation impacts in terms of VMT on the State Highway System, the City can refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA, dated December 2018.
- The updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues." Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated July 2020 and found here, for the County's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf>.

4-2

The following information is included for your consideration. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as providing one long-term and two short-term bicycle spaces. Additional TDM strategies that the City of San Gabriel may want to consider integrating into this project in order to further reduce VMT include:

4-3

- Provide additional long-term and short-term bicycle spaces.
- Ensure that improvements to sidewalks, curbs, and gutters are ADA compliant.
- Verify that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.

Also, 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. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit the Traffic Management Plan detailing these delays for Caltrans' review.

4-4

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2020-03337.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse



Response No. 4

California Department of Transportation District 7

Miya Edmonson, IGR/CEQA Branch Chief

September 11, 2020

4-1 This comment provides a general summary of the proposed project and notes that the proposed project is located approximately 4,500 feet away from the State Route 164 (SR-164) and Broadway intersection. It is also located approximately two miles away from the Interstate 10 (I-10) and San Gabriel Boulevard interchange. The comment provides a summary of the project description and existing transportation conditions. This summary is acknowledged; responses to specific comments within this letter are provided below.

4-2 The California Department of Transportation District 7 (Caltrans) summarizes Senate Bill 743 requirements and states that both a level of service (LOS) and vehicle miles travelled (VMT) analysis were provided for the IS/MND. The commenter concurs that the project's self-storage component is considered locally-serving retail and thus is presumed to have a less than significant transportation impact. The commenter also recommends that the City of San Gabriel update its *Traffic Study Guidelines for Development Projects in the City of San Gabriel* so that VMT is the primary basis for determining significant transportation impacts of future projects in the City. In accordance with Senate Bill 743, a VMT-based analysis is provided in Draft IS/MND Section 4.17, *Transportation*, Response 4.17(b).

Links to the Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020, and interim safety analysis guidance, dated July 2020, are provided for informational purposes. The commenter does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. Therefore, no further response is required.

4-3 The commenter provides transportation demand management (TDM) strategy recommendations for incorporation into the proposed project in order to further reduce impacts to VMT and greenhouse gas emissions. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. Nonetheless, development of the project would not conflict with existing and planned bicycle facilities within San Gabriel and would provide long- and short-term bicycle spaces on-site in conformance with relevant City bicycle parking regulations; refer to Section 4.17 of the Draft IS/MND. As such, the project would not conflict with a program plan, ordinance, or policy addressing the City's bicycle network. The project has been designed to encourage pedestrian activity and walking as a transportation mode. Walkability is defined as the extent to which walking is readily available as a safe, connected, accessible, and pleasant mode of transport. The interior of the project is planned to provide a combination of landscape and hardscape that facilitates internal accessibility as well as external connectivity to a broad range of uses beyond its boundaries. The project is situated adjacent and accessible to nearby commercial uses (e.g., retail, cafes, and restaurants) and other amenities along South San Gabriel Boulevard, as well as nearby transit stops and adjacent sidewalks on South San Gabriel Boulevard. Additionally, the project proposes a 25-foot roadway dedication and widening for



sidewalk installation along the west side of Gladys Avenue along the eastern project frontage. As such, development of the project would not conflict with a program plan, ordinance, or policy addressing the City's pedestrian network.

In addition, a sight distance analysis was conducted to evaluate the adequacy of sight distance at the project driveway intersections with South San Gabriel Boulevard and Commercial Avenue, which are planned to serve as the project's primary access points; refer to Draft IS/MND Exhibit 4.17-2, *Intersection Sight Distance at Project Driveways*. As shown on Exhibit 4.17-2, an adequate line of sight is provided for northbound and southbound vehicles approaching the South San Gabriel Boulevard project driveway. Based on a design speed of 30 mph, the existing intersection sight distance along Commercial Avenue also currently meets the minimum intersection sight distance for exiting vehicles and oncoming westbound (approaching) vehicles on Commercial Avenue. While the intersection sight distance of less than 335 feet is provided for the oncoming eastbound (approaching) vehicles on Commercial Avenue, these vehicles would be controlled by the new traffic signal installation at the intersection of South San Gabriel Boulevard and Commercial Avenue and thus, would not be traveling at posted speeds just east of South San Gabriel Boulevard.

In order to maintain the clear lines of sight at the project driveways, the Draft IS/MND includes Mitigation Measure TRA-2, which would require the line of sight at the two primary driveway intersections are cleared of any tall landscaping, signage, or objects greater than 36 inches in height. Additionally, Mitigation Measure TRA-2 would require the installation of red curb markings and signage along the following roadway segments to remove on-street parking: 1) along the north side of Commercial Avenue between the adjacent property's driveway and the project driveway, and 2) along the east side of South San Gabriel Boulevard between Commercial Avenue and the northern project boundary.

As no significant VMT or greenhouse gas impacts would result from the project, no additional mitigation measures are required. Notwithstanding, the comment is acknowledged and will be considered by the City of San Gabriel during project deliberations. No further response is required.

- 4-4 The commenter notes that the transportation of heavy construction equipment or materials, which requires use of oversized-transport vehicles on State highways, will need a Caltrans transportation permit and recommends that large-size truck trips be limited to off-peak commute periods to minimize potential transportation impacts on State facilities. Should a Caltrans transportation permit be required for the project, the applicant will comply with all laws and regulations, including those implemented by Caltrans. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. No further response is required.



3.0 ERRATA

Changes to the Draft Initial Study/Mitigated Negative Declaration (IS/MND) are noted below. A double-underline indicates additions to the text; ~~strikethrough~~ indicates deletions to the text. Changes have been analyzed and responded to in Section 2.0, Response to Comments, of this Final IS/MND. Changes are listed by page and, where appropriate, by paragraph.

These errata address the technical comments on the Draft IS/MND, which circulated from August 12, 2020 through September 11, 2020. The changes to the Draft IS/MND do not affect the overall conclusions of the environmental document. These clarifications and modifications are not considered to result in any new or substantially greater significant impacts as compared to those identified in the Draft IS/MND.

SECTION 2.0, PROJECT DESCRIPTION

Page 2-8, Utilities, Bullet 2

- Sewer. The Sanitation Districts of Los Angeles County (Districts) would provide sewer services to the project site. The project would install a 6-inch sewer line to connect to an existing locally maintained Districts-owned sewer mainline aligned in South San Gabriel Boulevard for conveyance to the Districts' Unit 1J Trunk Sewer located in San Gabriel Boulevard at Marshall Street.

Page 2-17, Section 2.6, Permits and Approvals

The City of San Gabriel is the Lead Agency for the project and has discretionary authority over the project proposal, which includes the following:

- Approval of the CEQA Clearance Document;
- Zone Change/Planned Development;
- ~~Development Agreement;~~
- Tentative Parcel Map;
- Precise Plan of Design;
- Master Sign Plan; and
- Issuance of applicable Grading and Building Permits.

SECTION 3.0, INITIAL STUDY CHECKLIST

Page 3-1, Section 3.1, Background

8. Description of Project:

The 414 South San Gabriel Project (herein referenced as the "project") proposes the construction of a climate-controlled self-storage facility and executive artists space on an approximately 1.75-gross acre site. The proposed structure would be four stories with a partial fifth story, and would include rental office spaces, executive artists spaces, and community arts spaces totaling 199,358-square feet. Project approval would require a Zone



Change/Planned Development, Development Agreement, Tentative Parcel Map, Precise Plan of Design, Master Sign Plan, Grading and Building Permits, and CEQA Clearance.

SECTION 4.19, UTILITIES AND SERVICE SYSTEMS

Page 4.19-2, Wastewater Treatment

Wastewater Treatment

The Sanitation Districts of Los Angeles County (Districts) would provide sewer services to the project site. The project would install a 6-inch sewer line to connect to an existing locally maintained Districts-owned sewer mainline aligned in South San Gabriel Boulevard for conveyance to the Districts' Unit 1J Trunk Sewer located in San Gabriel Boulevard at Marshall Street. The Districts' 21-inch diameter trunk sewer has a capacity of 7.7 million gallons per day (mgd) and conveyed a peak flow of 3.3 mgd when last measured in 2012.¹ Wastewater generated by the proposed project would be treated at the Joint Water Pollution Control Plant located in the City of Carson or the Los Coyotes Water Reclamation Plant located in the City of Cerritos. The Joint Water Pollution Control Plant has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd, while the Los Coyotes Water Reclamation Plant has a capacity of 37.5 mgd and currently processes an average flow of 21.7 mgd. Wastewater generated in the City of San Gabriel is treated by either the Districts' Whittier Narrows Water Reclamation Plant (WRP) located near the City of South El Monte, the Los Coyotes WRP located in the City of Cerritos, or the San Jose Creek WRP located adjacent to the City of Industry. The Whittier Narrows WRP has a capacity of 15 million gallons per day (mgd); the Los Coyotes WRP has a capacity of 37.5 mgd; and the San Jose Creek WRP has a capacity of 100 mgd. All three WRPs belong to the Districts' integrated network of facilities known as the Joint Outfall System.² Biosolids and wastewater flows that exceed the capacity of the these upstream WRPs are diverted to and treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 mgd.

As a self-storage facility with executive artist space, the project is not anticipated to generate substantial sources of additional wastewater above existing conditions. Based on correspondence with the Districts, the project's expected average wastewater flow would be 6,577 gallons per day (gpd) after the structures on the project site are demolished. This represents less than one percent of the Unit 1J Trunk Sewer's 7.7 mgd capacity, Joint Water Pollution Control Plant's 400 mgd capacity, and Los Coyotes Water Reclamation Plan's 37.5 mgd capacity. Nonetheless, the proposed project would be required to pay sewer connection fees and ongoing user fees. In addition, SGMC Section 154.002, *Sanitary Sewer Impact Fee*, imposes a development impact fee on all new development in the City to fund a project's fair share of costs to upgrade the City's sewer system. As the project is consistent with the land use designation for the area, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities. Payment of development impact fee, standard sewer connection fees, and ongoing user fees would ensure the project's impacts on existing wastewater facilities are adequately offset.

¹ Written Correspondence: Adriana Raza, Customer Service Specialist, Sanitation Districts of Los Angeles County, August 18, 2020.

² Los Angeles County Sanitation Districts, Joint Outfall System Water Reclamation Plants, https://www.lacsd.org/services/wastewater/wwfacilities/joint_outfall_system_wrp/default.asp, accessed March 31, 2020.



4.0 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring plan. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring plan must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, Table 1, *Mitigation Monitoring and Reporting Checklist*, has been prepared for the 414 South San Gabriel Boulevard Project (the "project"). This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable Conditions of Approval relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the City of San Gabriel 414 South San Gabriel Project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist (Table 1). If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- The City distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the Initial Study/Mitigated Negative Declaration, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the City as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
- Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.



- The City prepares a reporting form periodically during the construction phase and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures will be included in construction documents and/or conditions of permits/approvals.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. Such changes could include reassignment of monitoring and reporting responsibilities, plan redesign to make any appropriate improvements, and/or modification, substitution or deletion of mitigation measures subject to conditions described in CEQA Guidelines Section 15162. No change will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.6.



Table 1
Mitigation Monitoring and Reporting Checklist

Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
CULTURAL RESOURCES								
CUL-1	If previously unidentified cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted to mitigate any significant impacts. In the event that an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the project owner and City of San Gabriel to implement Native American consultation procedures. Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage any archaeological resources.	Construction Contractor; Qualified Archaeologist	During Ground-Disturbing Activities	City of San Gabriel Planning Division	During Ground-Disturbing Activities			
HAZARDS AND HAZARDOUS MATERIALS								
HAZ-1	<u>Soil Management Plan.</u> Prior to issuance of a grading permit, a Soil Management Plan (SMP) shall be prepared by a qualified environmental professional with Phase II/Site Characterization	Construction Contractor; Qualified Phase II/Site	Prior to the Issuance of a Grading Permit; During	City of San Gabriel Engineer	During Ground-Disturbing Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	<p>experience. The SMP shall be made available to the contractor and the City Engineer for use during grading activities. The SMP shall include guidelines for safety measures and soil management in the event that soils are to be disturbed, and for handling soil during any planned earthwork activities. The SMP shall also include a decision framework and specific risk management measures for managing soil, including any soil import/export activities, in a manner protective of human health and consistent with applicable regulatory requirements.</p> <p>As part of this SMP, all excavation activities shall be documented daily using digital photography. In addition, the sides and the bottom of the excavation areas of concern shall be appropriately logged on scaled paper. Observed materials, including an estimate of the quantity observed, and PID and dust monitor readings shall be recorded on the Daily Field Record and/or the Direct Reading Log.</p> <p>The SMP shall include measures should evidence of possible USTs be discovered during grading activities. If during grading activities evidence of a possible UST is discovered, the SMP shall require the project Applicant, or his designee, to contact the Los Angeles County Public Works Environmental Program Division (LACDPW) for further guidance</p>	Characterization Specialist	Ground-Disturbing Activities					



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	<p>and oversight, if deemed necessary by the LACDPW.</p> <p>If the results of the stockpile samples show no contamination, or detected concentrations of chemicals within acceptable regulatory limits for commercial uses, then the soil may be redistributed within the excavation. If soil is deemed contaminated, then it shall be disposed of off-site at an approved landfill facility. Should any soils be imported or exported at an off-site location, a Phase II/Site Characterization Specialist shall verify that all imported/exported soils are not contaminated with hazardous materials above regulatory thresholds. If import/export soils are determined to be contaminated above regulatory thresholds, the Phase II/Site Characterization Specialist would recommend proper handling, use, and/or disposal of these soils.</p>							
HAZ-2	<p><u>Removal of Contaminated Arsenic Soils.</u> Prior to site grading activities, the project Applicant shall submit documentation as proof, to the City Engineer, that the arsenic-impacted shallow soils at the southwestern portion of the project site have been excavated disposed of at a licensed facility with confirmation sampling to show that all remaining soil arsenic concentrations are below the U.S. Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) and/or Department of Toxic Substances Control modified Screening Levels (DTSC-SLs), as applicable. In no event shall the project Applicant</p>	Project Applicant	Prior to Site Grading Activities	City of San Gabriel Engineer	Prior to Site Grading Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	proceed with site grading activities at any location on the site, where arsenic contamination are found to be present above regulatory thresholds for commercial use.							
HAZ-3	<u>Asbestos and Lead-Containing Materials.</u> Prior to modification or demolition of existing structures (including piping materials), the project Applicant shall complete and submit a survey of all asbestos containing materials (ACMs) and lead-based paints (LBP) to the San Gabriel Fire Department (SGFD) for review and comment and to the City Engineer for approval. Should ACMs be identified, removal shall be performed by a State-certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403. Should LBPs be identified, LBPs shall be removed and disposed of in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. The project Applicant shall inform the project Engineer, via the monthly compliance report, of the date when all ACMs and LBPs are properly removed from the project site.	Project Applicant; State-certified asbestos containment contractor	Prior to Modification or Demolition of Existing Structures	San Gabriel Fire Department; City of San Gabriel Engineer	Prior to Modification or Demolition of Existing Structures; Monthly Compliance Reports if ACMs and LBPs are encountered			
TRANSPORTATION								
TRA-1	Prior to project construction initiation, the project applicant shall prepare a Traffic Management Plan (TMP) for approval by the City of San Gabriel Traffic Engineer. The TMP shall include measures to minimize potential safety impacts during the	Project Applicant or Construction Contractor	Prior to Issuance of Grading Permit; Project Specifications;	City of San Gabriel Traffic Engineer	Prior to Issuance of Grading Permit; Project Specifications;			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	short-term construction process if partial or full lane closures are required. The TMP shall specify that one direction of travel in each direction on adjacent roadways (i.e., South San Gabriel Boulevard and Commercial Avenue) must always be maintained during project construction activities. If full lane closures are required and one direction of travel in each direction cannot be maintained, the TMP shall identify planned detours. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and use of construction flagperson(s) to direct traffic during heavy equipment use. The TMP shall be incorporated into project specifications for verification prior to final plan approval.		During Construction Activities		During Construction Activities			
TRA-2	Prior to issuance of a building permit, the project Applicant shall include on final project design plans the installation of red curb markings and signage along the following segments: 1) along the north side of Commercial Avenue between the adjacent property's driveway and the project driveway, and 2) along the east side of South San Gabriel Boulevard between Commercial Avenue and the northern project boundary, to remove on-street parking and maintain clear lines of sight at the project's primary driveways. The entrances to the South San Gabriel Boulevard and Commercial Avenue driveways shall also be cleared of any tall landscaping, signage, or objects greater than 36 inches in height so as to maintain a clear line of	Project Applicant	Prior to Issuance of Building Permit	City of San Gabriel Traffic Engineer	Final Plan Check Review			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	sight between exiting vehicles and oncoming vehicles. The design plans shall be verified by the City of San Gabriel Traffic Engineer during final plan check review.							
TRIBAL CULTURAL RESOURCES								
TCR-1	Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation (the "Tribe" or the "Consulting Tribe"). Within 3 to 5 days of commencement of ground disturbing activities, the project applicant, or designee, shall provide a letter from the Native American Monitor, stating that they have been retained for the purposes of this mitigation measure, to the City of San Gabriel Planning and Building Department. The Tribal monitor shall be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor will complete daily monitoring logs, to be submitted to the City of San Gabriel Planning and Building Department, that include descriptions of the day's activities (i.e., construction activities, locations, soil, and any cultural materials identified). The on-site monitoring shall end when all ground-disturbing	Project Applicant; Construction Contractor; Approved Tribal Monitor/ Consultant; Qualified Archaeologist	Prior to Issuance of Grading Permit; During Ground-Disturbing Activities	City of San Gabriel Planning Division/ County Coroner (if necessary)	Prior to Issuance of Grading Permit; During Ground-Disturbing Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	<p>activities for the project are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed.</p> <p>All Tribal Cultural Resources unearthed by project activities shall be evaluated by the Native American Monitor and the qualified archaeologist (defined in Mitigation Measure CUL-1). If the resources are Native American in origin, the Native American Monitor shall identify the appropriate Consulting Tribe and such Tribe will retain the resource(s) in the form and/or manner the Tribe deems appropriate (e.g., for educational, cultural, and/or historic purposes). Upon discovery of human remains, the Native American Monitor and/or qualified archaeologist (Mitigation Measure CUL-1) shall immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The Native American Monitor shall then notify the Tribe, the qualified lead archaeologist, and the construction manager who shall notify the County coroner per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently</p>							



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the Native American Heritage Commission (NAHC) as mandated by State law who shall then appoint a Most Likely Descendent (MLD).							