



U-HAUL REDEVELOPMENT PROJECT

FINAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION JUNE 2022

Prepared for:

City of Gardena
Community Development Department
Development Services
1700 West 162nd Street
Gardena, CA 90247

Prepared by:

De Novo Planning Group
180 E. Main Street, Suite 108
Tustin, CA 92780



D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm





U-HAUL REDEVELOPMENT PROJECT

Final Initial Study/Mitigated Negative Declaration

LEAD AGENCY: CITY OF GARDENA

1700 West 162nd Street
Gardena, California 90247
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June 2022

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1.0 INTRODUCTION

The U-Haul Redevelopment Project (Project) site comprised of approximately 4.2-acres located at 14206 S. Van Ness Avenue (APNs 4061-028-023, -033, and -051) in the City of Gardena. The Project Applicant requests approval of the proposed Project, which includes a Zone Change (ZC) #1-21, Conditional Use Permit (CUP) #1-21, Site Plan Review (SPR) #3-21, and a Zone Text Amendment (ZTA) #2-21.

The Project proposes to remove the existing on-site structures and develop a new, modern U-Haul Moving and Storage facility. In addition to providing U-Haul truck and trailer sharing and retail sales, the location would house regional U-Haul marketing operations. An approximately 177,573 gross square foot, five-story storage facility would be located within the northern portion of the site and a separate 8,000-square foot single-story building for retail sales and office use would be located within the southern portion of the site, adjacent to Rosecrans Avenue. The proposed storage facility would provide a total of 1,620 storage units distributed throughout the five levels and a covered truck shunting area on the ground floor. The existing propane tank and guardrail and two “U-Haul” marquee signs would remain in their current locations.

In accordance with the California Environmental Quality Act (CEQA) Guidelines, an Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the proposed Project.

The IS/MND was made available for public review and comment pursuant to CEQA Guidelines Section 15073 and 15105. The public review period commenced on May 5, 2022 and concluded on May 24, 2022. The IS/MND and supporting attachments were available for review by the general public at the following locations:

- City of Gardena Website:
<https://www.cityofgardena.org/community-development/planning-projects/>
- City of Gardena City Hall, Receptionist – 1700 West 162nd Street, Gardena
- Gardena Mayme Dear Library – 1731 West Gardena Boulevard, Gardena

The Public Review Draft IS/MND identifies the potential environmental impacts associated with development of the Project and mitigation measures to reduce the potentially significant impacts. The Responses to Comments and Mitigation Monitoring and Reporting Program, together with the Public Review Draft IS/MND, constitutes the Final IS/MND for the proposed U-Haul Redevelopment Project.

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2.0 RESPONSES TO COMMENTS

During the public review period, comments were received on the IS/MND. The following is a list of the public agencies, organizations, and individuals that submitted comments on the IS/MND during the public review period:

Comment Letter Number	Agency, Organization or Individual	Letter Dated
1	Ken Virzi, Resident	May 6, 2022
2	Sam Stewart, Resident	May 6, 2022
3	Mandy Huffman, Environmental Planner Facilities Planning Department Los Angeles County Sanitation Districts	May 20, 2022

Although the CEQA Guidelines do not require a Lead Agency to prepare written responses to comments received on an IS/MND, the City of Gardena has elected to prepare written responses with the intent of conducting a comprehensive and meaningful evaluation of the proposed Project. The comment letters and responses are provided on the following pages. The comment letters have been numbered sequentially. The number designations in the responses correlate to the numbered portions of each comment letter.

sbarker@denovoplanning.com

From: Amanda Acuna <AAcuna@cityofgardena.org>
Sent: Monday, May 16, 2022 10:06 AM
To: sbarker@denovoplanning.com; lkranitzlaw@gmail.com
Subject: FW: U-Haul Redevelopment Project

Good Morning Starla,

We received the following public comment for the Uhaul project.

Amanda Acuna

Senior Planner | City of Gardena
1700 West 162nd Street | Gardena CA | 90247
Phone 310.217.9524 | Fax 310.217.9698 | aacuna@cityofgardena.org
Website: www.cityofgardena.org

From: Kenneth Virzi <kvirzi@gmail.com>
Sent: Friday, May 6, 2022 12:55 PM
To: Amanda Acuna <AAcuna@cityofgardena.org>
Subject: U-Haul Redevelopment Project

Caution! This message was sent from outside your organization.

Hello Amanda,

I am a resident of Rosecrans Place (the new G3 Urban development on Rosecrans near VanNess). Fun fact, I was actually the very first to move in. I have created a group for all those moving in and there have been issues with the U-Haul next door.

1-1

The lights have been a major problem by some of the residence next to the wall, the abandoned building has also been an eye sore and a place where vagrants hang out and they come into our development quite a bit.

There are currently 6-8 self storage businesses within one mile of Rosecrans Place. The need for more self storage seems overloaded. With Rosecrans Place, Gardena Place, and Walnut Place the need is more retail businesses. Restaurants, Markets, etc. A Trader Joe market would be a dream.

1-2

Also a five story building near our place is something many are worried about blocking the view and being a problem. I as many hope you can change this planning away from self storage to a place that we can actually use and be happy with.

1-3

Thank you so much,

Ken Virzi
2085 Copper Walk
Gardena, CA 90249

Response to Commenter Letter No. 1

Ken Virzi, Resident
May 6, 2022

- 1-1 The comment identifies issues with existing lighting from the Project site on adjacent residential uses and concerns regarding the existing vacant building. The Project would remove existing on-site buildings, including the vacant former restaurant building. The proposed development would be required to submit a complete security and lighting plan in accordance with Gardena Municipal Code Section 18.42.150, *Security and Lighting Plan*. The purpose of the security and lighting plan is to ensure that safety and security issues are addressed in the design of developments. Lighting plans are required to demonstrate an average of 2-foot candle for all public/common areas. Additionally, the placement, height, and direction of illumination of light standards would be reviewed as part of the Site Plan Review to ensure the proposed lighting would not adversely affect neighboring uses (Gardena Municipal Code Chapter 18.44, Section 18.44.030, *Factors for Approval*). The City would also review new lighting for conformance with the Building Energy Efficiency Standards in effect at the time of building permit application to ensure the minimum amount of lighting is used, and no light spillage would occur.
- 1-2 The comment notes the number of storage businesses within proximity to the Project site and the need for different businesses within the area. The comment does not provide any specific comments or statements regarding the environmental analysis or conclusions contained in the Draft IS/MND; no further response is necessary.
- 1-3 The comment references the proposed five-story building and concerns about the blocking of views and request to change planning for the site away from self-storage. The Project site is located within an urbanized area and is currently developed with a U-Haul storage facility. There are no scenic resources within the Project site or surrounding area. Thus, the Project would not obstruct or block views of scenic resources. Consistent with California Environmental Quality Act (CEQA) requirements, a Project could result in a significant environmental impact if it would conflict with applicable zoning and other regulations governing scenic quality. Although the Gardena Municipal Code does not identify specific regulations governing scenic quality, the review process would ensure the physical design of the proposed Project is consistent and compatible with the site and surrounding area.

The Project site is located at the northeast corner of Van Ness Avenue (a major collector roadway) and Rosecrans Boulevard (an arterial). The Project proposes a Zone Text Amendment (ZTA) #2-21 to amend Gardena Municipal Code Section 18.34.030, to allow for greater ground floor street frontage and Zone Change (ZC) #1-21 to change the zoning of the site from General Commercial (C-3) with a Mixed Use Overlay (MUO) to Heavy Commercial (C-4) with a MUO. If approved, the Project would be subject to the requirements of Gardena Municipal Code Section 18.34, *Heavy Commercial Zone (C-4)*, which addresses permitted and prohibited development intended to provide for highway related uses. Section 18.34.030 establishes uses permitted within the C-4

zone that are subject to a CUP; self-storage facilities are a use that is subject to a CUP. Section 18.34.050 discusses property development standards that apply to all land and buildings in the C-4 zone. Additionally, the Project would be required to comply with Gardena Municipal Code Chapter 18.42, *General Provisions*, which addresses fences, hedges and walls; setbacks; security and lighting plans, and pedestrian amenities, amongst others. It is noted the maximum building height allowed in the C-4 zone is 65 feet and the proposed self-storage facility would be 62.5 feet tall and would be setback 34 feet (including 10 feet of landscaping) from the eastern property line. As part of the City's Site Plan Review process required under Gardena Municipal Code Chapter 18.44, *Site Plan Review*, the Project site plan would be reviewed and only approved after finding the proposed development, including the uses and the physical design of the development is consistent with the intent and general purposes of the General Plan and provisions of the Gardena Municipal Code, and will not adversely affect the orderly and harmonious development of the area (Gardena Municipal Code Section 18.44.030, *Factors for Approval*).

From: Amanda Acuna <AAcuna@cityofgardena.org>
Sent: Monday, May 16, 2022 10:42 AM
To: sbarker@denovoplanning.com
Cc: lkranitzlaw@gmail.com
Subject: FW: U-Haul Redevelopment Project

Here is another public received for the Uhaul project.

Amanda Acuna
Senior Planner | City of Gardena
1700 West 162nd Street | Gardena CA | 90247
Phone 310.217.9524 | Fax 310.217.9698 | aacuna@cityofgardena.org
Website: www.cityofgardena.org

From: Sam Stewart <samantha.an.stewart@gmail.com>
Sent: Friday, May 6, 2022 3:19 PM
To: Amanda Acuna <AAcuna@cityofgardena.org>
Subject: U-Haul Redevelopment Project

Caution! This message was sent from outside your organization.

Hello Amanda,

I am a new Gardena resident in Rosecrans Place (the new G3 Urban development on Rosecrans near VanNess). I'd like to object to the expansion of the U-Haul Redevelopment project near Van Ness and Rosecrans.

The lights have been a major problem for some of the residents next to the wall. Additionally, the abandoned building has also been an eye sore and a place where vagrants hang out and they come into our development quite a bit. Also, a five story building near our place is something many are worried about blocking the view and being a problem.

2-1

There are currently 6-8 self storage businesses within one mile of Rosecrans Place, so it seems unnecessary to add self-storage units. With Rosecrans Place, Gardena Place, and Walnut Place, this corner of the city is adding / has added over 150 new residents. Far from more industrial space, we need more retail businesses: restaurants, markets, greenery, etc. A Trader Joe's or Whole Foods Market would be a dream, but definitely no more industrial spaces.

2-2

I, as many, hope you can change this planning away from self storage to a place that we can actually use and be happy with and really help bring the community of Gardena together.

Thank you so much,

Samantha Stewart
2107 Copper Walk
Gardena, CA 90249

Response to Commenter Letter No. 2

Samantha Stewart, Resident
May 16, 2022

- 2-1 The comment objects to the Project, identifies issues with existing lighting from the Project site on adjacent residential uses, identifies concerns regarding the existing vacant building, and notes the proposed building would block views. The Project would remove existing on-site buildings, including the existing vacant building. The proposed development would be required to submit a complete security and lighting plan in accordance with Gardena Municipal Code Section 18.42.150, *Security and Lighting Plan*. The purpose of the security and lighting plan is to ensure that safety and security issues are addressed in the design of developments. Lighting plans are required to demonstrate an average of 2-foot candle for all public/common areas. Additionally, the placement, height, and direction of illumination of light standards would be reviewed as part of the Site Plan Review to ensure the proposed lighting would not adversely affect neighboring uses (Gardena Municipal Code Chapter 18.44, Section 18.44.030, *Factors for Approval*). The City would also review new lighting for conformance with the Building Energy Efficiency Standards in effect at the time of building permit application to ensure the minimum amount of lighting is used, and no light spillage would occur.

The Project site is located within an urbanized area and is currently developed with a U-Haul storage facility. There are no scenic resources within the Project site or surrounding area. Thus, the Project would not obstruct or block views of scenic resources. Consistent with California Environmental Quality Act (CEQA) requirements, a Project could result in a significant environmental impact if it would conflict with applicable zoning and other regulations governing scenic quality. Although the Gardena Municipal Code does not identify specific regulations governing scenic quality, the review process would ensure the physical design of the proposed Project is consistent and compatible with the site and surrounding area.

The Project site is located at the northeast corner of Van Ness Avenue (a major collector roadway) and Rosecrans Boulevard (an arterial). The Project proposes a Zone Text Amendment (ZTA) #2-21 to amend Gardena Municipal Code Section 18.34.030, to allow for greater ground floor street frontage and Zone Change (ZC) #1-21 to change the zoning of the site from General Commercial (C-3) with a Mixed Use Overlay (MUO) to Heavy Commercial (C-4) with a MUO. If approved, the Project would be subject to the requirements of Gardena Municipal Code Section 18.34, *Heavy Commercial Zone (C-4)*, which addresses permitted and prohibited development intended to provide for highway related uses. Section 18.34.030 establishes uses permitted within the C-4 zone that are subject to a CUP; self-storage facilities are a use that is subject to a CUP. Section 18.34.050 discusses property development standards that apply to all land and buildings in the C-4 zone. Additionally, the Project would be required to comply with Gardena Municipal Code Chapter 18.42, *General Provisions*, which addresses fences, hedges and walls; setbacks; security and lighting plans, and pedestrian amenities, amongst others. It is noted the maximum building height allowed in the C-4 zone is 65 feet and the proposed self-storage facility would be 62.5 feet

tall and would be setback 34 feet (including 10 feet of landscaping) from the eastern property line. As part of the City's Site Plan Review process required under Gardena Municipal Code Chapter 18.44, *Site Plan Review*, the Project site plan would be reviewed and only approved after finding the proposed development, including the uses and the physical design of the development is consistent with the intent and general purposes of the General Plan and provisions of the Gardena Municipal Code, and will not adversely affect the orderly and harmonious development of the area (Gardena Municipal Code Section 18.44.030, *Factors for Approval*).

- 2-2 The comment notes the number of storage businesses within proximity to the Project site, identifies new residential development that has occurred within the area, and the need for different businesses within the area. The commenter also requests to plan away from self-storage. The comment does not provide any specific comments or statements regarding the environmental analysis or conclusions contained in the Draft IS/MND; no further response is necessary.



**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

May 20, 2022

Ref. DOC 6540145

Ms. Amanda Acuna, Senior Planner
City of Gardena
1700 West 162nd Street
Gardena, CA 90247

Dear Ms. Acuna:

NOI Response to the U-Haul Redevelopment Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (MND) for the subject project on May 20, 2022. The proposed project is located within the jurisdictional boundaries of District No. 5. 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' Moneta Extension Section 2 Trunk Sewer, located in Van Ness Avenue at Rosecrans Avenue. The Districts' 18-inch diameter trunk sewer has a capacity of 2.7 million gallons per day (mgd) and conveyed a peak flow of 0.6 mgd when last measured in 2016. | 3-1 |
| 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 249.8 mgd. | 3-2 |
| 3. | The expected increase in average wastewater flow from the project site, described in the MND as a 177,573 square foot storage facility and an 8,000 square foot retail sales and office, is 1,880 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. | 3-3 |
| 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 used by the Districts for its capital facilities. Payment of a connection fee may 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. | 3-4 |
| 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 | 3-5 |

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 CAA. 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.

3-5 cont.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsdc.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

Response to Commenter Letter No. 2

Mandy Huffman, Environmental Planner, Facilities Planning Department
Los Angeles County Sanitation Districts
May 20, 2022

- 3-1 The comment notes that wastewater flow will discharge to a local sewer line, not maintained by the Districts for conveyance to the Districts' trunk sewer located in Van Ness Avenue and Rosecrans Avenue. The comments also provides the size, capacity, and peak flow of the Districts' trunk sewer that would serve the proposed development. The comment does not provide any specific comments or statements regarding the environmental analysis or conclusions contained in the Draft IS/MND; no further response is necessary.
- 3-2 The comment notes the proposed Project-generated wastewater will be treated at the Joint Water Pollution Control Plant with a capacity of 400 million gallons per day (mgd) and a current average flow of 249.8 mgd. The information is noted and confirms available treatment capacity. The comment does not provide any specific comments or statements regarding the environmental analysis or conclusions contained in the Draft IS/MND; no further response is necessary.
- 3-3 The comment identifies the average wastewater flow from the Project site as 1,880 gallons per day based on the size of the storage facility and retail sales and office buildings. The information is noted. The comment does not provide any specific comments or statements regarding the environmental analysis or conclusions contained in the Draft IS/MND; no further response is necessary.
- 3-4 The comment notes the Districts charge a fee to connect facilities to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. The comment does not provide any specific comments or statements regarding the environmental analysis or conclusions contained in the Draft IS/MND; no further response is necessary.
- 3-5 The comment notes the capacities of the Districts' wastewater treatment facilities are based on regional growth forecasts adopted by the Southern California Association of Governments (SCAG). The comment does not provide any specific comments or statements regarding the environmental analysis or conclusions contained in the Draft IS/MND; no further response is necessary.

3.0 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 program. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6). Specifically, Public Resources Code §21081.6 states:

- (a) *When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:*
 - (1) *The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.*
 - (2) *The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.*

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide the mechanism by which to monitor mitigation measures outlined in the U-Haul Redevelopment Project IS/MND. The U-Haul Redevelopment Project MMRP has been prepared in conformance with Public Resources Code §21081.6 and City of Gardena (City) monitoring requirements.

State CEQA Guidelines §15097 provides clarification of mitigation monitoring and reporting requirements and guidance to local lead agencies on implementing strategies. The reporting or monitoring program must be designed to ensure compliance during project implementation. The City of Gardena is the Lead Agency for the U-Haul Redevelopment Project and is therefore responsible for ensuring MMRP implementation. This MMRP has been drafted to meet Public Resources Code §21081.6 requirements as a fully enforceable monitoring program.

The MMRP Checklist is intended to provide verification that all applicable mitigation measures 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 U-Haul Redevelopment Project file.

This 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 MMRP Checklist. If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

For the purposes of the environmental analysis in the IS/MND, impacts were analyzed in each environmental issue area for the proposed Project. Consideration of standard Conditions of Approval (COAs) that apply to each respective topical area was considered, particularly if that impact would be further reduced. If a potentially significant impact remained after implementation of applicable COAs, mitigation measures were also identified in order to reduce any significant impacts.

The numbering system in the following table corresponds with the IS/MND's numbering system. The MMRP table "Verification" column will be used by the parties responsible for documenting when the mitigation measure has been completed. The City of Gardena will complete ongoing documentation and mitigation compliance monitoring. The completed MMRP and supplemental documents will be kept on file at the City of Gardena Community Development Department.

Mitigation Monitoring and Reporting Program Checklist

Mitigation Measures	Implementation Timing	Monitoring/ Reporting Methods	Responsible for Approval/ Monitoring	Verification		
				Initials	Date	Remarks
BIOLOGICAL RESOURCES						
BIO-1: Construction, grubbing, brushing, or tree removal shall be conducted outside of the state identified nesting season for migratory birds (i.e., typically March 15 through September 1), if possible. If construction activities cannot be conducted outside of nesting season, a Pre-Construction Nesting Bird Survey within and adjacent to the Project site shall be conducted by a qualified biologist within three days prior to initiating construction activities. If active nests are found during the Pre-Construction Nesting Bird Survey, a Nesting Bird Plan (NBP) shall be prepared by a qualified biologist and implemented during construction. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, nesting sage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity.	Pre-Construction if Not Outside of the Nesting Season/Prior to Issuance of Permits/During Construction, if Active Nests Found	Pre-Construction Nesting Bird Survey/Nesting Bird Plan, if Active Nests Found	Applicant/ Contractor, Biologist and Community Development Director/ City Building Official			
CULTURAL RESOURCES						
CUL-1: Prior to the beginning of ground disturbances, the Project proponent shall retain an archaeologist meeting Secretary of the Interior Standards (SOI) to oversee spotcheck cultural resources monitoring of all excavations two feet and deeper within the Project site. Spotchecks shall occur weekly on average, and no less often than once every seven days that ground disturbance occurs. If a cultural object is uncovered, the qualified monitor shall be empowered to temporarily redirect work away from the find while it is evaluated. Work	Prior to Ground Disturbing Activities During Ground Disturbing Activities Involving	Construction Site Monitoring & Completion of Daily Monitoring Logs	Applicant/ Contractor, Approved Archaeologist, and Community Development Director			

Mitigation Measures	Implementation Timing	Monitoring/ Reporting Methods	Responsible for Approval/ Monitoring	Verification		
				Initials	Date	Remarks
can continue a minimum of 50 feet away from the find. For finds that are not significant, work may resume immediately after the find is documented and removed. If a find is significant, a mitigation plan shall be developed, and mitigation completed, prior to work continuing within the 50-foot cordon.	Excavations Two Feet and Deeper	Archaeological Resource Evaluation/ Development and Implementation of Mitigation Plan, if Applicable				
CUL-2: Prior to the beginning of ground disturbances, the qualified monitor shall give a Worker Environmental Awareness Program training presentation prepared by the SOI qualified supervising archaeologist to all construction staff. This presentation shall inform construction personnel what cultural resources may be uncovered during the ground-disturbing phases of the project and what to do who to in case of a find.	Prior to Ground Disturbing Activities	Verification of Provision of Worker Environmental Awareness Program Training	Applicant/ Contractor, Approved Archaeologist, and Community Development Director			
CUL-3: Refer also to Mitigation Measure TCR-3 (<u>Section 4.18, Tribal Cultural Resources</u>). Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e). According to the provisions in CEQA, should human remains be encountered, all work in the immediate vicinity of the burial shall cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The Los Angeles County Coroner shall be immediately notified and must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the Native	During Construction	Evaluation of Remains/ Notification of NAHC, if Applicable	Tribal Monitor, Archaeologist, and Community Development Director			

Mitigation Measures	Implementation Timing	Monitoring/ Reporting Methods	Responsible for Approval/ Monitoring	Verification		
				Initials	Date	Remarks
American Heritage Commission (NAHC), who will in turn, notify the person they identify as the Most-Likely-Descendent (MLD) of any human remains.						
GEOLOGY AND SOILS						
GEO-1: Paleontological resources monitoring by a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall be required during ground disturbances greater than 5.0 feet below the historic surface elevation in native sediments. Paleontological monitoring shall entail the visual inspection of excavated or graded areas and trench sidewalls. In the event that a paleontological resource is discovered, the monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Monitoring efforts can be reduced or eliminated at the discretion of the project paleontologist after 30 percent of earthwork is completed.	Prior to Ground Disturbing Activities During Ground Disturbing Activities	Paleontological Monitor Agreement Construction Site Monitoring & Completion of Daily Monitoring Logs	Community Development Director/City Building Official, Approved Paleontologist and Applicant/ Contractor			
TRIBAL CULTURAL RESOURCES						
TCR-1: <u>Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.</u> The Project Applicant 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,	Prior to Ground Disturbing Activities During Ground Disturbing Activities During Construction, if Discovery of	Tribal Cultural Monitor Agreement Construction Site Monitoring & Completion of Daily Monitoring Logs	Community Development Director/City Building Official, Approved Tribal Monitor and Applicant/ Contractor			

Mitigation Measures	Implementation Timing	Monitoring/ Reporting Methods	Responsible for Approval/ Monitoring	Verification		
				Initials	Date	Remarks
<p>demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>A copy of the executed monitoring agreement shall be submitted to the City 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>The monitor shall 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 materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall 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 shall be provided to the Project Applicant/City of Gardena upon written request to the Tribe.</p> <p>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 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 that no future, planned construction activity</p>	Tribal Cultural Resources Occurs	<p>Written Confirmation of No Additional Monitoring</p> <p>Completion of Resource Recovery, if Applicable</p>				

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<p>and/or development/construction phase at the Project site possesses the potential to impact Kizh TCRs.</p> <p>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>TCR-2: Refer also to Mitigation Measure CUL-3</p> <p><u>Unanticipated Discovery of Human Remains and Associated Funerary Objects.</u> 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>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 halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native</p>	During Construction	Evaluation of Remains/ Notification of NAHC, if Applicable	Tribal Monitor, Archaeologist and Community Development Director			

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<p>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>Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).</p> <p>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 monitor 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>Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.</p> <p>Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>						
TCR-3: <u>Procedures for Burials and Funerary Remains</u> . 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	Upon Discovery of Remains	Implementation of Procedures for Burials and Funerary Remains	Tribal Monitor/ Tribe, Archaeologist, and Community Development Director, and			

Mitigation Measures	Implementation Timing	Monitoring/ Reporting Methods	Responsible for Approval/ Monitoring	Verification		
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<p>funerary objects with the deceased, and the ceremonial burning of human remains.</p> <p>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>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>In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall 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 shall 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.</p> <p>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</p>			NAHC, if applicable			

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<p>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>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> <p>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.</p>						