

Final
ENVIRONMENTAL IMPACT REPORT
STATE CLEARINGHOUSE NO. 2014071042

IRWINDALE REGIONAL SHOPPING CENTER
CITY OF IRWINDALE
LOS ANGELES COUNTY, CALIFORNIA

LSA

March 6, 2015

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STATE CLEARINGHOUSE NO. 2014071042

IRWINDALE REGIONAL SHOPPING CENTER
CITY OF IRWINDALE
LOS ANGELES COUNTY, CALIFORNIA

Prepared for:

City of Irwindale
Community Development Department
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LSA

March 6, 2015

TABLE OF CONTENTS

1.	<u>INTRODUCTION</u>	2
1.1	CONTENT AND FORMAT	2
1.2	PUBLIC REVIEW OF THE DRAFT EIR	2
1.3	POINT OF CONTACT	2
1.4	PROJECT SUMMARY	3
2.	<u>RESPONSE TO COMMENTS</u>	5
2.1	LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES COMMENTING ON THE Draft EIR	6
2.2	FORMAT OF RESPONSES TO COMMENTS.....	6
	LETTER A: COUNTY OF LOS ANGELES FIRE DEPARTMENT.....	7
	LETTER B: CITY OF AZUSA, ECONOMIC AND Community Development Department.....	18
	LETTER C: CITY OF EL MONTE, ECONOMIC DEVELOPMENT DEPARTMENT	21
	LETTER D: STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION, DISTRICT 7 Office of Transportation Planning	25
	LETTER E: STATE CLEARINGHOUSE	31
3.	<u>EIR ERRATA AND ADDITIONS</u>	37
4.	<u>MITIGATION MONITORING AND REPORTING PROGRAM</u>	41

1. INTRODUCTION

The Final Environmental Impact Report (FEIR) for the proposed is composed of the Draft EIR (DEIR) Irwindale Regional Shopping Center State Clearinghouse No. 2014071042 and Appendices; the Response to Comments; Mitigation Monitoring and Reporting Program (MMRP), and the Findings, Staff Reports, and Resolutions. Specifically, this document portion of the EIR includes the Comments and Responses of the Final EIR, EIR modifications or errata to the DEIR, and the Mitigation Monitoring and Reporting Program. The purpose of this document is to respond to all comments received by the City of Irwindale (City) regarding the environmental information and analyses contained in the Draft EIR. Additionally, any corrections to the text and figures of the Draft EIR, generated either from responses to comments or independently by the City, are stated in this volume of the Final EIR.

1.1 CONTENT AND FORMAT

Subsequent to this introductory section, Section 2.0 contains copies of each comment letter received on the Draft EIR, along with annotated responses to each comment contained within the letters. Section 3 of this document contains corrections and errata to the Draft EIR. Section 4.0 contains the MMRP.

1.2 PUBLIC REVIEW OF THE DRAFT EIR

As required by the California Environmental Quality Act (CEQA) Guidelines Section 15087, a Notice of Completion (NOC) and Notice of Availability (NOA) of the Draft EIR State Clearinghouse No. 2014071042 for the Irwindale Regional Shopping Center project was filed with the Office of Planning and Research State Clearinghouse on December 24, 2014, and the NOA of the Draft EIR was filed with the Los Angeles County Recorder on December 24, 2014.

The Draft EIR was circulated for public review for a period of 45 days, from December 24, 2014 to February 6, 2015. Copies of the Draft EIR were distributed to all Responsible Agencies and to the State Clearinghouse in addition to various public agencies, citizen groups, and interested individuals. Copies of the Draft EIR were also made available for public review at the City Department of Community Development, at one area library, and on the internet.

A total of five (5) comment letters were received, from State and local agencies and none from private organizations, conservation groups, or individuals. All five letters have been responded to within this document. In particular, comments that address environmental issues are responded to in Section 2.0.

1.3 POINT OF CONTACT

The Lead Agency for this Project is the City of Irwindale. Any questions or comments regarding the preparation of this document, its assumptions, or its conclusions, should be referred to:

Gustavo Romo, Community Development Director
Irwindale City Hall
Department of Community Development
5050 North Irwindale Avenue
Irwindale, California 91706
Phone: (626) 430-2206
Email: gromo@ci.irwindale.ca.us

1.4 PROJECT SUMMARY

The following information is summarized from the Project Description in the Draft EIR. For additional detail in regard to Project characteristics and Project-related improvements, along with analyses of the Project's potential environmental impacts, please refer to Draft EIR Sections 3.0 and 4.0, respectively.

1.4.1 Project Location/Existing Conditions

The project area is generally located west of Interstate 605 (I-605), south of Interstate 210 (I-210) and north of Interstate 10 (I-10) in the northwestern portion of the City of Irwindale in Los Angeles County. The project site is specifically located at the southwest corner of the I-605/Live Oak Avenue interchange approximately 750 feet east of Arrow Highway and is currently occupied by the Irwindale Event Center (aka Irwindale Speedway) with an address of 500 Speedway Drive. The project site consists of three parcels of land identified as Assessor's Parcel Numbers (APNs) 8532-004-022, 8532-004-025, and 8532-004-026 totaling approximately 63.5 acres. The project site is bordered by Live Oak Avenue and a landfill to the north, an active quarry to the south, I-605 to the east, and a trucking and distribution center to the west.

The project area is located in portions of Sections 12 of Township 1 South, Range 11 West, as depicted on the U.S. Geological Survey (USGS) 7.5-minute series El Monte, California quadrangle (latitude 34° 06' 35" north and longitude 117° 59' 16" west).

The project site is currently developed with the Irwindale Speedway in the City of Irwindale. The project site is approximately 63.5 acres and is zoned M-2 (Heavy Manufacturing) and is relatively flat. The General Plan land use designation for the site is Commercial/Recreation.

The project site consists entirely of urban/developed uses, which include vast human disturbance associated with the existing use. The project area includes roads, buildings and structures, pavement, and concrete. The project site is not associated with any native vegetation and provides only limited habitat value, primarily as cover, nesting, and perching opportunities for birds and common terrestrial wildlife that have adapted to urban conditions, and other disturbed areas associated with human activity.

1.4.2 Proposed Project

The project site is approximately 63.5 acres in size. The proposed project includes the construction and occupancy of an approximately 700,000-square foot shopping center and associated parking. In addition to the primary function of the shopping center to provide "retail" commercial space for shopping opportunities, the project includes ancillary amenities including a central plaza for public gatherings, entryway features, an outdoor entertainment/performance area, and a food court. The proposed project will include related improvements, including, but not limited to parking, landscape planters, fencing, and walls.

The shopping center is expected to employ approximately 5,000 people. Regular hours of operation of the shopping center are expected to be Monday through Saturday from 10 a.m. to 9 p.m. and Sundays from 10 a.m. to 7 p.m. It is anticipated that extended hours of operation will occur during holidays.

The project would be completed in two phases. Phase 1 of the project would start in early 2015 and be completed in fall 2017 and would include demolition of the speedway and associated buildings, all site preparation and grading, and would develop approximately 455,000 square feet or 65 percent of the total project building space. Phase 2 would start in winter of 2017 and be completed in the fall of 2018 and would develop approximately 245,000 square feet or 35 percent of the total project space. Concrete, asphalt, and other acceptable demolition debris would be used on site as fill within the

racetrack oval as well as other portions of the project as deemed necessary for proper preparation of the site's foundations.

1.4.3 Project Objectives

The purpose of the proposed project is to provide a new regional shopping center on former commercial land within the western portion of the City. The following main objectives have been developed for the proposed Irwindale Regional Shopping Center Project:

- To provide employment opportunities for various segments of the region and local community;
- To provide a pleasant and unique shopping experience for outlet-focused customers looking for bargains within and outside the region;
- To increase tourism and bolster the image of Irwindale as a regional hub;
- To encourage complementary uses around the shopping center in an effort to further boost economic development in the City and region; and
- To meet the goals and objectives of the City's General Plan by implementing uses consistent with the "Commercial/Recreation" land use designation.

1.4.4 Required Permits and Discretionary Actions

City of Irwindale

This project-level EIR is intended to inform the City of Irwindale decision-makers and the general public of the environmental consequences of the proposed project. Entitlements being analyzed in this EIR include:

- *Zone Change No. 03-2013.* Approval of the project includes a zone change that would change the existing zoning from M-2 (Heavy Manufacturing) to C-2 (Heavy Commercial). *Site Plan & Design Review Permit No. 01-2013.* Approval of the project includes a detailed review of the proposed site plan and architectural design of the project. *Development Agreement No. 01-2013.*

Actions by Others

Although the City of Irwindale is the Lead Agency for the proposed project, a number of other Federal, State, or special purpose agencies may consult on this EIR for their own decision-making and actions now or in the future. The following is a list of anticipated discretionary or non-discretionary actions by other agencies; however, it is not exhaustive and may include other agencies and processes in the future as appropriate:

State of California

- Regional Water Quality Control Board: Water Quality Permitting.
- South Coast Air Quality Management District

2. RESPONSE TO COMMENTS

A total of five (5) comment letters were received, all from State and local agencies and none from private organizations, conservation groups, or individuals. All five letters have been responded to within this document. Comments that address environmental concerns have been specifically addressed. Comments that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not relevant to environmental issues, do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines.

Section 15088 of the State CEQA Guidelines, Evaluation of and Response to Comments, states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.
- b) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.
- c) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:
 1. Revise the text in the body of the EIR; or
 2. Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this volume of the Final EIR clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of the responses to comments, and no significant new information has been added that would require recirculation of the document.

An Errata section to the EIR (Section 3.0 in this document) has been prepared to make corrections and clarifications to the Draft EIR as a result of City review and comments received during the public review period. Therefore, this Response to Comments document, along with the Errata is included as part of the Final EIR for consideration by the Planning Commission prior to a recommendation to the City Council to certify the Final EIR.

2.1 LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES COMMENTING ON THE DRAFT EIR

The comments regarding the Draft EIR are listed below. A total of five (5) comment letters were received, all from State and local agencies and none from private organizations, conservation groups, or individuals. Each comment letter received is indexed with a letter and number below.

Comment Letters Received Regarding the Draft EIR

- Letter A** **County of Los Angeles Fire Department (January 20, 2015)**
Kevi T. Johnson, Acting Chief, Forestry Division Prevention Services Bureau
- Letter B** **City of Azusa, Economic and Community Development Department (January 26, 2015)**
Kurt Christiansen, Director of Economic and Community Development
- Letter C** **City of El Monte, Economic Development Department (February 5, 2015)**
Jason Mikaelian, AICP, Planning Manager
- Letter D** **State of California Department of Transportation, District 7 Office of Transportation Planning (February 6, 2015)**
Rick Holland, Acting IGR/CEQA Branch Chief
- Letter E** **Office of Planning and Research, California State Clearinghouse (February 12, 2015)**
Scott Morgan, State Clearinghouse Director

2.2 FORMAT OF RESPONSES TO COMMENTS

Aside from the courtesy statements, introductions, and closings, individual comments within the body of each letter have been identified and numbered. A copy of each comment letter and the City's responses are included in this section. Brackets delineating the individual comments and an alphanumeric identifier have been added to the right margin of the letter. Responses to each comment identified are included on the page(s) following each comment letter. Responses to comments were sent to the agencies that provided comments.

In the process of responding to the comments by agencies there were no revisions to the Environmental Impact Report. None of the comments or responses constitutes "significant new information" (*CEQA Guidelines* Section 15073.5) that would require recirculation of the Environmental Impact Report.

LETTER A: COUNTY OF LOS ANGELES FIRE DEPARTMENT

Kevi T. Johnson, Acting Chief, Forestry Division Prevention Services Bureau, dated January 20, 2015



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

Letter A

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

January 20, 2015

Paula Kelly, Senior Planner
City of Irwindale
Planning Department
5050 North Irwindale Avenue
Irwindale, CA 91706

Dear Ms. Kelly:

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT,
"IRWINDALE REGIONAL SHOPPING CENTER," PROPOSED A SHOPPING
CENTER CONSISTS OF AN APPROXIMATELY 700,000 SQUARE FOOT TO
PROVIDE COMMERCIAL SPACE AND FOR SHOPPING OPPORTUNITIES, TO BE
COMPLETED IN TWO PHASES, 500 SPEEDWAY DRIVE, IRWINDALE
(FFER 201400247)**

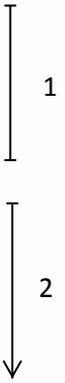
The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION

1. We have no comments at this time.

LAND DEVELOPMENT UNIT

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. Specific Fire and Life Safety requirements will be addressed during the site plan review and building plan check review.



SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- | | | | | | | | |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|-----------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR | HIDDEN HILLS | LA MIRADA | MALIBU | POMONA | SIGNAL HILL |
| ARTESIA | CARSON | DUARTE | HUNTINGTON PARK | LA PUENTE | MAYWOOD | RANCHO PALOS VERDES | SOUTH EL MONTE |
| AZUSA | CERRITOS | EL MONTE | INDUSTRY | LAKEWOOD | NORWALK | ROLLING HILLS | SOUTH GATE |
| BALDWIN PARK | CLAREMONT | GARDENA | INGLEWOOD | LANCASTER | PALMDALE | ROLLING HILLS ESTATES | TEMPLE CITY |
| BELL | COMMERCE | GLENDDORA | IRWINDALE | LAWNDALE | PALOS VERDES ESTATES | ROSEMEAD | WALNUT |
| BELL GARDENS | COVINA | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA | PARAMOUNT | SAN DIMAS | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HAWTHORNE | LA HABRA | LYNWOOD | PICO RIVERA | SANTA CLARITA | WESTLAKE VILLAG |
| BRADBURY | | | | | | | WHITTIER |

Paula Kelly, Senior Planner
January 20, 2015
Page 2

Submit a minimum of four (4) copies of the site plan and a minimum of one (1) copy of the elevations to the Land Development Unit for review.

ACCESS REQUIREMENTS

1. Prior to the issuance of any building permits, the required Fire Apparatus Access Roads and the public and private fire hydrants shall be inspected for compliance by the County of Los Angeles Fire Department.
2. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
2. Fire Department vehicular access roads must be installed and maintained in a serviceable manner prior to and during the time of construction.
Fire Code 501.4.
4. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.
5. The edge of the fire access roadway shall be located a minimum of 5 feet from the building or any projections there from.
6. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
7. If the proposed buildings are less than 30 feet in height provide a minimum unobstructed width of 26 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building.
Fire Code 503.1.1 and 503.2.2.
 - a) The Fire Apparatus Access Road shall be cross-hatch on the site plan, and the width shall be clearly noted.
8. If the proposed buildings are 30 feet or greater in height provide a minimum unobstructed width of 28 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all

Paula Kelly, Senior Planner
January 20, 2015
Page 3

portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2.

- a) The Fire Apparatus Access Road shall be cross-hatch on the site plan and the width shall be clearly noted.
9. If the Fire Apparatus Access Road is separated by island, provide a minimum unobstructed width of 20 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building. Fire Code 503.1.1 and 503.2.2.
- a) The Fire Apparatus Access Road shall be cross-hatch on the site plan and the width shall be clearly noted.
10. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1.
11. Dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with an approved Fire Department turnaround. Fire Code 503.2.5.
- a) Include: The dimensions of the turnaround with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway.
12. Fire Department vehicular access roads shall be provided with a 32-foot centerline turning radius. Fire Code 503.2.4.
- a) Indicate the centerline, inside, and outside turning radii for each change in direction on the site plan.
13. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 37 ½ tons and shall be surfaced so as to

Paula Kelly, Senior Planner
January 20, 2015
Page 4

- provide all-weather driving capabilities. Fire apparatus access roads having a grade of 10 percent or greater shall have a paved or concrete surface. Fire Code 503.2.3.
14. The gradient of Fire Department vehicle access roads shall not exceed 15 percent unless approved by the fire code official. Fire Code 503.2.7.
 15. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE". Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads to clearly indicate the entrance to such road or prohibit the obstruction thereof and at intervals as required by the Fire Inspector. Fire Code 503.3.
 16. A minimum 5 foot wide approved firefighter access walkway leading from the fire department access road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Fire Code 504.1.
 - a) Clearly identify firefighter walkway access routes on the site plan. Indicate the slope and walking surface material. Clearly show the required width.
 17. Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches from the top of the parapet to the roof surface on more than two sides. Fire Code 504.5.
 - a) Clearly indicate the height of all parapets in an elevation view.
 18. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters and be a minimum of 4-inches high with a minimum stroke width of ½ inch. Fire Code 505.1.
 19. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by

Paula Kelly, Senior Planner
January 20, 2015
Page 5

Fire Code 505.3 and in accordance with Fire Code 505.1.

20. Fire Apparatus Access Roads shall be identified with approved signs. Temporary signs shall be installed at each street intersection when construction of new roadways allows passage by vehicles. Signs shall be of an approved size, weather resistant, and be maintained until replaced by permanent signs. Fire Code 505.2.
21. An approved key box, listed in accordance with UL 1037 shall be provided as required by Fire Code 506. The location of each key box shall be determined by the Fire Inspector.
22. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues. The fire code official is authorized to require more than one Fire Apparatus Access Road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions, or other factors that could limit access. Such additional access must comply with Title 21 of the Los Angeles County Code. Fire Code 503.1.2.
23. Fire Apparatus Access Roads shall not be obstructed in any manner including by the parking of vehicles or the use of traffic calming devices including but not limited to speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4.
24. Traffic Calming Devices including but not limited to speed bumps and speed humps shall be prohibited unless approved by the fire code official. Fire Code 503.4.1.
25. When security gates are provided maintain a minimum access width of the Fire Apparatus Access Road. The security gate shall be provided with an approved means of emergency operation and shall be maintained operational at all times and replaced or repaired when defective. Electric gate operators where provided shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F220. Gates shall be of the swinging or sliding type. Construction of gates shall be of materials that allow manual operation by one person. Fire Code 503.6.

Paula Kelly, Senior Planner
January 20, 2015
Page 6

WATER SYSTEM REQUIREMENTS

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Department Regulation 8.
2. All required PUBLIC fire hydrants shall be installed, tested, and accepted prior to beginning construction. Fire Code 501.4.
3. All on-site fire hydrants shall be installed a minimum of 25 feet from a structure or protected by a two (2)-hour rated firewall. Indicate compliance prior to the approval of this project. Fire Code Appendix C106.
4. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy. Fire Code 901.5.1.
 - a) Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation. Fire Code 901.2 and County of Los Angeles Fire Department Regulation 7.
5. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c) Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
 - e) A cul-de-sac shall not be more than 500 feet in length when serving land zoned for commercial use.
6. The specific fire flow will be determined based on the type of construction of each building the square footage of each building and if there is an automatic fire sprinkler system is installed.

Paula Kelly, Senior Planner
January 20, 2015
Page 7

- a) The required fire flow for the public fire hydrants for this project is 5000 gpm at 20 psi residual pressure for 5 hours. Three (3) public fire hydrants flowing simultaneously may be used to achieve the required fire flow. Fire Code 507.3 and Appendix B105.1.
 - b) The required fire flow for the on-site private fire hydrants for this project is 5000 gpm at 20 psi residual pressure for 5 hours. Three (3) on-site fire hydrants flowing simultaneously may be used to achieve the required fire flow.
7. For the existing public fire hydrants, submit the completed original copy of the Fire Flow Availability Form (Form 196). The fire flow data shall be submitted to the County of Los Angeles Fire Department's Land Development Unit prior to the issuance for clearance of this project. A fire hydrant upgrade is not necessary if existing hydrants meet the fire flow requirements.

If there are any questions regarding the Land Development Unit's comments, please contact FPEA Claudia Soiza or Wally Collins at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS

- 1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

HEALTH HAZARDOUS MATERIALS DIVISION

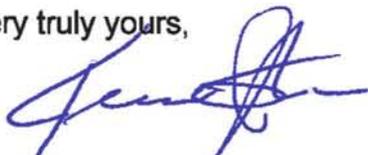
- 1. The Health Hazardous Materials Division has no additional comments than those already provided.



Paula Kelly, Senior Planner
January 20, 2015
Page 8

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Kevin T. Johnson". The signature is stylized with a large initial "K" and a long horizontal stroke at the end.

KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad

RESPONSE TO LETTER A COUNTY OF LOS ANGELES FIRE DEPARTMENT

Response to Comment A-1. The City acknowledges the Planning Division does not have any comments.

Response to Comment A-2. The comments made by the Land Development Unit relate to fire safety and access, and fire hydrants flow and placement conditions of approval for the proposed project site plan and are not comments made on the Draft EIR. The City will submit the required copies of the site plan to the County Fire Department, Land Development Unit for review prior to issuance of building permits.

Response to Comment A-3. The Draft EIR, Section 4.5 Hydrology and Water Quality, subsection 4.5.6.1 Construction-Related Water Quality Impacts, pages 4.5-21- 4.5-23 determined the while on-site grading and development activities will increase the potential for the erosion of soils, adherence to Mitigation Measures 4.5.6.1A and 4.5.6.1B will reduce impacts associated with short-term (construction) storm water discharges during project construction to a less than significant level. Operational Related Water Quality Impacts are analyzed in the Draft EIR Section 4.5 Hydrology and Water Quality, pages 4.5-23 – 4.5-26 and it was determined the proposed project incorporates on-site drainage control structures and programs sufficient to meet the applicable Federal, State, and local water quality requirements. Through the use of site design Best Management Practices (BMPs), source control BMPs (e.g., street and parking lot sweeping and vacuuming), and treatment control BMPs (e.g., media filters in drainage features) the pollutant loads will be reduced resulting in a reduction of pollutants discharged from urban storm water runoff to surface water bodies. Compliance with the requirements of the National Pollutant Discharge Elimination System permit, which include implementation of the BMPs outlined in the Standard Urban Stormwater Mitigation Plan, will be enforced by the City during the ongoing occupancy of the project, reducing this impact to a less than significant level.

The City is located in the Los Angeles-San Gabriel Hydrologic Unit, bounded on the north by the San Gabriel Mountain Range, which is the origin for most of the region's surface runoff. The San Gabriel River Watershed is located in the eastern portion of Los Angeles County. It is bounded by the San Gabriel Mountains to the north, most of San Bernardino/Orange County to the east, the division of the Los Angeles River from the San Gabriel River to the west, and the Pacific Ocean to the south. (Draft EIR, page 4.5-1). Water resources in the City and throughout the San Gabriel Valley are sustained by substantial groundwater basins, which are used as reservoirs to store water during wet years. These underground reservoirs are tapped throughout the year according to the demand for water. Groundwater conditions in these basins are influenced by natural hydrologic conditions such as percolation of precipitation, groundwater seepage, and ephemeral stream flow within the watershed areas. Groundwater supplies are also augmented with recharged surface water purchased through the State Water Project. The project site is located within the Main San Gabriel Basin (Draft EIR, page 4.5-2). Impacts on drainage and groundwater are analyzed in the Draft EIR under Section 4.5 5 Hydrology and Water Quality, pages 4.5-11 – 4.5-20 and it was determined the proposed project would have a less than significant impact on drainage and groundwater.

The Initial Study (dated July 10, 2014) prepared for the proposed project analyzed the project's effects on rare and endangered species and vegetation and it was determined there are no impacts (refer to Appendix A, Initial Study pages 3-8 through 3-10). The project is also not in a High Fire Hazard Zone or Fire Zone 4 and is not required to prepare a fuel management plan or implement a fuel management plan (refer to Appendix A, Initial Study page 3-17).

The proposed project's impacts on cultural resources were also determined to be less than significant (refer to Appendix A, Initial Study pages 3-10 through 3-11). The proposed project is void of native trees including oaks; therefore the proposed project is consistent with the County's Oak Tree Ordinance (refer to Appendix A, Initial Study pages 3-8 through 3-10).

Response to Comment A-4. The City acknowledges the Heath Hazardous Materials Division does not have any comments.

NOTE: These comments do not result in the need to revise the Draft EIR document.

**LETTER B: CITY OF AZUSA, ECONOMIC AND COMMUNITY DEVELOPMENT
DEPARTMENT**

Kurt Christiansen, Director of Economic and Community Development, dated January 26,
2015



ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

TO: Paula Kelly, Senior Planner

FROM: Kurt Christiansen, Economic and Community Director

VIA: Edson Ibanez, Assistant Planner

DATE: January 26, 2015

SUBJECT: Public Review for Irwindale Regional Shopping Center in Irwindale, CA:
Draft Environment Impact Report

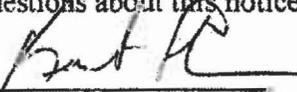
Project location: The proposed project is located west of Interstate 605 (I-605), south of Interstate 210 (I-210), and north of Interstate 10 (I-10) in the northwestern portion of the City of Irwindale, California

Project Description: The proposed Irwindale Regional Shopping Center consists of an approximately 700,000 square-foot shopping center on a 63.5 acre site. In addition to the primary function of the shopping center to provide commercial space for shopping opportunities, the project includes ancillary amenities including a central plaza for public gatherings, entryway features, an outdoor entertainment/performance area, and a food court.

Proximity to Azusa: The project is located approximately 3.2 miles South of the West End Industrial zone.

Noise and Traffic Impacts: The proposed project has no significant impact on the City of Azusa.

Please contact Edson Ibanez in the Planning Division at (626) 812-5289 if you have any questions about this notice.

X 

Kurt Christiansen
 Director of Economic and Community Development
 Zoning Administrator
 213 E. Foothill Boulevard
 Azusa, CA 91702

1

2

**RESPONSE TO LETTER B
CITY OF AZUSA, ECONOMIC AND COMMUNITY DEVELOPMENT
DEPARTMENT**

Response to Comment B-1. Information provided in the letter restates the project location, description, and the proximity of the project to the City of Azusa. No response or clarification is required.

Response to Comment B-2. The City of Azusa is agreeing with the Draft EIR analysis that noise and traffic impacts are not significant. No response or clarification is required.

NOTE: These comments do not result in the need to revise the Draft EIR document.

**LETTER C: CITY OF EL MONTE, ECONOMIC DEVELOPMENT
DEPARTMENT**

Jason Mikaelian, AICP, Planning Manager, dated February 5, 2015



CITY OF EL MONTE
ECONOMIC DEVELOPMENT DEPARTMENT

Minh Thai,
Economic Development
Director

Letter C

February 5, 2015

Ms. Paula Kelly, Senior Planner
City of Irwindale
5050 N. Irwindale Avenue
Irwindale, CA 91706

SUBJECT: Irwindale Regional Shopping Center Draft EIR
Live Oak Avenue west of the I-605 Freeway

Dear Ms. Kelly,

Thank you for giving the City of El Monte the opportunity to comment on the Draft EIR for your proposed Irwindale Regional Shopping Center. We have reviewed the materials and offer the following comments:

Project Trip Generation

- The project uses a deduction of over 50 percent during the PM Peak Hour and Saturday Peak Hour totals. Please provide your justification to support the methodology used. 1
- The deductions taken for daily trips do not match the deductions taken for PM Peak Hour and Saturday Peak Hour Trips. 2
- The Total Daily Trips shown on the tables correspond to weekday daily trips. Did you also have information on Saturday Daily Trips? 3

Trip Distribution

- The study assumes very little traffic coming from the West via surface streets such as Peck Road. Please provide your justification to support the methodology used. 4

The City of El Monte welcomes additional conversations in order to address the comments. Please feel free to contact me at (626) 580-2064 or at jmikaelian@elmonteca.gov if you have any questions.

Sincerely,

Jason Mikaelian, AICP
Planning Services Manager

cc: Minh Thai, Economic Development Director
Alan Palermo, Interim City Engineer

RESPONSE TO LETTER C CITY OF EL MONTE, ECONOMIC DEVELOPMENT DEPARTMENT

Response to Comment C-1. Contrary to the statement made in this comment, the EIR does not assess the impacts of the project based on a trip reduction of over 50% during the weekday p.m. and Saturday peak hours. Table 4.7.J in the EIR shows the quantity of the projects trips allocated to pass-by and diverted linked trips, and presents “total net new trips” derived by subtracting the pass-by and diverted trips from the gross total. The text on page 4.7-24 in the EIR also discusses and presents total net new trips. The City concedes that these representations in the text and table of the EIR imply that the total net new trips must therefore have been used in the traffic analysis, when in fact that is not the methodology employed. The pass-by and diverted trips methodologies followed in the TIA prepared for this EIR are explained as follows.

Pass-by trips are trips in and out of a project site that are already part of the vehicular flow on a roadway that fronts a project. Inbound pass-by trips are complimented by a corresponding outbound pass-by trip. These trips are not “reduced” or removed from the project’s trip generation, rather, they are re-assigned from the existing or background flow of traffic. For example, westbound pass-by trips at the intersection of Driveway 1/Live Oak Avenue has a weekday p.m. peak hour pass-by of 19 trips. These trips are re-assigned as a westbound left-turn at the project driveways on Live Oak Avenue, and the westbound through volume is reduced by the same 19 trips. These same 19 trips are added back into the flow on Live Oak Avenue as northbound left-turns at the project driveways on Live Oak Avenue. The total pass-by trips are illustrated in Figures 16 and 17 of the TIA (included in its entirety as EIR Appendix G).

Diverted linked trips are similar to pass-by trips, but involve a diversion from one roadway to another roadway, and finally inbound to and outbound from a project site. In the TIA prepared for this EIR, diverted linked trips are diverted from I-605 at Arrow Highway and Live Oak Avenue to and from the project site. For example, as shown in Table Q of the TIA, the diverted linked trips in the p.m. peak hour are 140 inbound and 140 outbound trips for a total of 280 trips. These 140 inbound and 140 outbound trips have been assigned to the I-605 off-ramps on Arrow Highway and Live Oak Avenue to the project site. Figure 18 of the TIA illustrates the assignment of the 140 inbound and 140 outbound diverted linked trips from the I-605 at Arrow Highway and Live Oak Avenue to the project site. In other words, these trips are included in the trips added at these ramps, and are therefore part of the project-added trips. No reduction of trips or trip credit has been taken. The diverted linked trips have been assigned to and from the Arrow Highway and Live Oak Avenue on-ramps and off-ramps. Therefore, the total diverted linked trips for the p.m. and Saturday peak hours were assigned at the State facilities on Arrow Highway and Live Oak Avenue to the project site, and thus are part of the project added trips potentially affecting the on- and off-ramps.

The pass-by and diverted linked trips are based on rates from the Institute of Transportation Engineers (ITE) *Trip Generation Handbook 2nd Edition*.

Response to Comment C-2. Since there is no pass-by or diverted-linked data available for the a.m. peak hour and daily, the pass-by and diverted linked trips calculated for the p.m. peak hour were applied to the daily traffic. As shown in Table 4.7.J, the exact same quantity of total pass-by and diverted linked trips shown in the p.m. peak hour columns are shown in the daily column.

Response to Comment C-3. Based on rates from ITE Trip Generation 9th Edition, the total gross new daily trips for Saturday would be approximately 28,679. Accounting for pass-by and diverted-linked trips, the total net new daily trips for Saturday would be approximately 27,298 trips.

Response to Comment C-4. The trip distribution for the project was developed based on trip distribution factors provided in the Los Angeles County Congestion Management Plan (CMP), discussion with City of Irwindale staff, and relation to the surrounding roadway network and land uses. The CMP distribution factors are derived from regional traffic models (see page D-3 to D-4 of the 2010 Los Angeles County CMP, Appendix D, Guidelines for CMP Transportation Impact Analysis), providing a reasonable basis for distribution of project trips.

NOTE: These comments do not result in the need to revise the Draft EIR document.

**LETTER D: STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION,
DISTRICT 7 OFFICE OF TRANSPORTATION PLANNING**

Rick Holland, Acting IGR/CEQA Branch Chief, dated February 6, 2015

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-9140
 FAX (213) 897-1337
 www.dot.ca.gov



*Serious drought.
 Help save water!*

Letter D

February 6, 2015

Ms. Paula Kelly
 City of Irwindale
 5050 North Irwindale Avenue
 Irwindale, CA 91706

RE: Irwindale Regional Shopping Center
 Vic. LA-605, PM
 SCH # 2014071042
 Ref. IGR/CEQA No. 140729NY-NOP
 IGR/CEQA No. 150114AL-DEIR

Dear Ms. Kelly:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Irwindale Regional Shopping Center consists of an approximately 700,000 square-foot shopping center on a 63.5 acre site. The project site is located west of I-605 at the current site of the Irwindale Speedway racetrack.

Based on a review of the traffic impact analysis contained in the Draft Environmental Impact Report (DEIR), Caltrans has the following comments:

The proposed project will generate approximately 17,788 daily trips, 469/778 AM/PM peak hour trips (Table Q). The vehicle trip generation estimate assumes reductions due pass-by trips of (34% PM, 26% Saturday) and diverted linked trips (26.4% PM, 35.2% Saturday). Caltrans does not concur with the reduction for diverted linked trips. Diverted linked trips reductions are generally not taken as some trips are diverted from a specific route and others are diverted to that same route thus cancelling each other's effect. In addition, diverted linked trips are considered new trips to the project site. These trips will cause traffic impacts on the State facilities when the project is developed. The combined vehicle trip reductions due to pass-by trips and diverted linked trips reduce the total vehicle trip generation by approximately 60% during weekday PM hours, such reduction seems excessive. Caltrans recommends that the diverted linked trips reduction be removed or reduced. We are open for discussions to clarify how these numbers were calculated.

1

The cumulative projects will generate 20,994 daily trips, 1,856/1,905 AM/PM peak hour trips. Many of those trips will utilize I-605 on and off ramps as well as the I-210 and I-10; therefore, this project may contribute to a cumulative significant traffic impact to State highway facilities in

2

the future. The cumulative significant traffic impact may be unavoidable if no traffic mitigation is proposed. Decision makers should be aware of this issue and be prepared to help mitigate the potential cumulative traffic impacts on the State highway system. Caltrans is available to work with the City in identifying mitigation alternatives for cumulative traffic impacts.

2

On page 9 of the Traffic Impact Analysis prepared in November 2014, "The analysis addresses the Caltrans NOP comments, dated July 18, 2014; and is in accordance with the Los Angeles County Metropolitan Transportation Authority '2010 Congestion Management Project' (CMP)". In our view, CMP requirements do not adequately analyze the impact to the State Highway System, as it does not consider potential cumulative effect and safety. Consultation with Caltrans is needed when analyzing the freeway system.

3

Existing freeway segment volumes provided are based on Average Annual Daily Traffic (AADT) counts published by Caltrans in 2012. Generally, reasonable worst case scenario for the traffic data should be used for an existing freeway condition. We encourage the City to utilize the most recent traffic data available. Please contact Caltrans, we may be able to provide more recent data.

4

Tables BB,DD, FF analyzing freeway segments may need to be revised to reflect more recent volumes and adjusted trip assignments. Recent data from the PeMS system shows that LOS of I-605 segments analyzed is LOS D and E. Current data show that LOS of I-210 and I-10 is LOS "F" during the peak hours.

Existing and future LOS of I-605 segments listed below may need to be revised accordingly.

I-605 Freeway, Northbound

- 1. North of Arrow Highway
- 7. South of Live Oak Avenue

I-605 Freeway, Southbound

- 8. North of Arrow Highway
- 12. South of Arrow Highway

5

From Caltrans Guide for the Preparation of Traffic Impact Studies, December 2002, as a reminder, "The level of service (LOS) for operating State highway facilities is based upon measures of effectiveness (MOEs). Caltrans endeavors to maintain a target LOS at the transition between LOS 'C' and LOS 'D' on State highway facilities. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained." Continuing on page 9, the consultant provides an incorrect statement, "...for the purpose of this report, LOS D is used as the minimum level of service standard." The LOS threshold on State facilities can only be determined and agreed upon by the City and Caltrans. Otherwise, we recommend the City follow Caltrans' Guide.

6

Caltrans has concerns when an excessive amount of trips are assigned to off-ramps, thus causing congestion to the mainline, which in turn may lead to rear-end accidents. For the off-ramp queuing analysis, the off ramps should be analyzed utilizing the Highway Capacity Manual (HCM) queuing analysis methodology with the actual signal timings at the ramps' termini. Generally, the demand of the off-ramp should be calculated from the traffic counts, including the percentage of truck assignments to the ramp with a passenger car equivalent factor of 3.0 (worst

7

case scenario). The analyzed result may need to be calibrated with actual signal timing when necessary. Please include mitigation measures if forecasted vehicle queues are expected to exceed 85% of the total available storage capacity such that the storage will allow a 15% safety factor.

7

We are aware that currently the City and Caltrans are planning to install a traffic signal and construct a second northbound right turn lane at the Northbound I-605 off-ramp to eastbound Live Oak Avenue; to install a traffic signal at the northbound I-605 off-ramp to westbound Live Oak Avenue; to provide a third westbound through lane on Live Oak Avenue by modifying the existing raised median; to construct a 2nd southbound left turn lane at southbound I-605 off-ramp to Arrow Highway including the necessary traffic signal modification. Table AA-Project Fair Share calculates a percentage of contribution at Intersection #9 I-605 Northbound Ramp/Live Oak Avenue. This percentage calculation may need to be revised. Please refer to Caltrans Guide for the Preparation of Traffic Impact Studies, December 2002, Appendix B, for an alternate fair share formula.

8

On February 4, 2015, Caltrans engineer, Mr. Alan Lin, City Engineer, Mr. William Tan, and LSA Associates, Inc agreed to meet to discuss potential traffic impacts and mitigation on these State facilities. In the Spirit of Mutual Cooperation, we look forward to working with the City in an effort to try to resolve the various issues raised in this letter. If you have any questions or wish to schedule a meeting, please feel free to contact Alan Lin the project coordinator at (213) 897-8391.

9

Sincerely,



RICK HOLLAND
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

**RESPONSE TO LETTER D
STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION, DISTRICT 7
OFFICE OF TRANSPORTATION PLANNING**

Response to Comment D-1. This comment quotes the total net new trips attributable to the project as found in EIR Table 4.7.J (also found TIA Table Q). The comment then expresses concerns with what the Commenter believes are excessive reductions in trip generation levels based upon the identification of pass-by trips and diverted linked trips. Finally, the Commenter expresses concerns that these trip reductions understate the number of trips the project will introduce to certain of its facilities.

In response to this comment, the City met with the Commenter to discuss these comments and worked with the Commenter on addressing them. Based upon those cooperative discussions, the City agreed to include two additional improvement projects which the Commenter stated would adequately address its concerns as related to this project. These additional improvement projects are as follows:

1. Construct an improvement at the I-605 N/B off-ramp at Live Oak Avenue that includes a second lane for the E/B Live Oak off-ramp, and to construct two new traffic signals to improve operation at these intersections. The two new traffic signals will be interconnected with the existing traffic signals in the area to improve the traffic operation in the area. This project is currently in the design phase using both City and federal funds. This is to be completed prior to issuance of a certificate of occupancy for the project.
2. Construct an improvement at the I-605 S/B off-ramp at Arrow Highway that includes an additional lane for the E/B Arrow Highway off-ramp, and to modify the existing traffic signal to allow for the optimization of the traffic signal timing. In addition, the traffic signal modification will include interconnection with the existing traffic signals in the area to improve the traffic operation in the area. Construction of this project is to commence at the completion of the project.

These projects, when completed, will add storage capacity to the two off-ramps that are within the project area.

Response to Comment D-2. This comment states that the project may contribute to cumulative impacts to I-210, I-10, and I-605, and Caltrans is available to work with the City to address such cumulative impacts. As stated in the response to comment D-1, the City has worked closely with the Commenter to address the comments made in its letter, including this comment. Based upon those cooperative and constructive meetings, the City agreed to construct the additional improvements set forth in the response to Comment D-1. The City appreciates the Commenter's willingness to work cooperatively with the City to resolve Commenter's concerns.

Response to Comment D-3. The comment states that the CMP traffic study guidelines do not adequately analyze impacts to State facilities, and do not consider potential cumulative effects and safety. The City believes that the methodologies contained in the CMP guidelines address cumulative and safety effects associated project traffic. However, recognizing Commenter's interests with regard to its transportation facilities, the City has worked closely with the Commenter to address the concerns raised in its letter, including this comment. Based upon those cooperative and constructive meetings, the City agreed to construct the additional improvements set forth in the response to Comment D-1. The City appreciates the Commenter's willingness to work cooperatively with the City to resolve Commenter's concerns.

Response to Comment D-4. The Commenter believes that there may be more recent AADT counts

to assist with evaluating the reasonable worst case scenario for traffic impacts. The City used the most recent data that was published at the time of commencement of the EIR preparation process which was the Caltrans 2012 traffic volume data. However, as stated above the City has worked closely with the Commenter to address the comments raised in its letter, including this comment. Based upon those cooperative and constructive meetings, the City agreed to construct the additional improvements set forth in the response to Comment D-1. The City appreciates the Commenter's willingness to work cooperatively with the City to resolve Commenter's concerns.

Response to Comment D-5. As stated in the Response to Comment D-4, the TIA uses Caltrans 2012 traffic volume data. However, the City has worked closely with the Commenter to address the comments raised in its letter, including this comment. Based upon those cooperative and constructive meetings, the City agreed to construct the additional improvements set forth in the response to Comment D-1. The City appreciates the Commenter's willingness to work cooperatively with the City to resolve Commenter's concerns.

Response to Comment D-6. The comment notes that Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D." This comment is noted. As stated previously, the City has worked closely with the Commenter to address the concerns raised in its letter, including this comment. Based upon those cooperative and constructive meetings, the City agreed to construct the additional improvements set forth in the response to Comment D-1. The City appreciates the Commenter's willingness to work cooperatively with the City to resolve Commenter's concerns.

Response to Comment D-7. This comment raises questions regarding the methodology used for the queuing analysis. The queuing analysis was conducted using Synchro software which uses HCM methodologies. However, the City has worked closely with the Commenter to address the concerns raised in its letter, including this comment. Based upon those cooperative and constructive meetings, the City agreed to construct the additional improvements set forth in the response to Comment D-1. The City appreciates the Commenter's willingness to work cooperatively with the City to resolve Commenter's comments including its comment regarding the queuing analysis.

Response to Comment D-8. This comment acknowledges the infrastructure improvement projects that the City and Commenter are currently working on together to address certain capacity issues. As stated previously, the City has worked closely with the Commenter to address the comments raised in its letter, including this comment. Based upon those cooperative and constructive meetings, the City agreed to construct the additional improvements set forth in the response to Comment D-1 and has reached agreement regarding the appropriate methodology for calculating the project's fair share contribution toward the construction of these project. The City appreciates the Commenter's willingness to work cooperatively with the City to resolve Commenter's concerns.

Response to Comment D-9. A follow up meeting at Caltrans' District 8 Offices was conducted on February 12, 2015. The meeting was attended by Caltrans staff members, the City's Community Development Director and City Engineer, and the EIR consultant LSA Associates. Several topics of conversation were discussed. At the conclusion of the meeting, Caltrans confirmed that the February 6, 2015 letter constituted Caltrans comments on the Draft EIR. Previous Responses to Comments D-1 through D-8 provide the City's responses to Caltrans comments on the Draft EIR. As stated in the responses to Comments D-1 through D-8, the City has worked closely with the Commenter to address the comments made in its letter in the form of subsequent meetings and phone calls. Based upon those cooperative and constructive meetings, the City agreed to construct the additional improvements set forth in the response to Comment D-1. The City appreciates the Commenter's willingness to work cooperatively with the City to resolve all of Commenter's concerns.

NOTE: These comments do not result in the need to revise the Draft EIR document.

LETTER E: STATE CLEARINGHOUSE

Scott Morgan, Director, dated February 12, 2015



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

February 12, 2015

Paula Kelly
City of Irwindale
5050 N. Irwindale Avenue
Irwindale, CA 91706

Subject: Irwindale Shopping Center Initial Study
SCH#: 2014071042

Dear Paula Kelly:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on February 6, 2015. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2014071042) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

RECEIVED

FEB 18 2015

CITY OF IRWINDALE
PLANNING DEPARTMENT

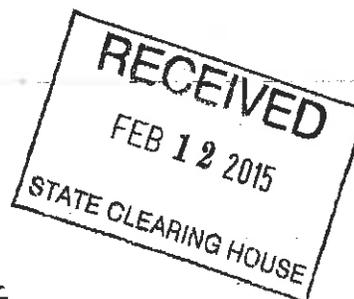
DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
 100 S. MAIN STREET, MS 16
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*Serious drought.
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February 6, 2015

Ms. Paula Kelly
 City of Irwindale
 5050 North Irwindale Avenue
 Irwindale, CA 91706



RE: Irwindale Regional Shopping Center
 Vic. LA-605, PM
 SCH # 2014071042
 Ref. IGR/CEQA No. 140729NY-NOP
 IGR/CEQA No. 150114AL-DEIR

Dear Ms. Kelly:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Irwindale Regional Shopping Center consists of an approximately 700,000 square-foot shopping center on a 63.5 acre site. The project site is located west of I-605 at the current site of the Irwindale Speedway racetrack.

Based on a review of the traffic impact analysis contained in the Draft Environmental Impact Report (DEIR), Caltrans has the following comments:

The proposed project will generate approximately 17,788 daily trips, 469/778 AM/PM peak hour trips (Table Q). The vehicle trip generation estimate assumes reductions due pass-by trips of (34% PM, 26% Saturday) and diverted linked trips (26.4% PM, 35.2% Saturday). Caltrans does not concur with the reduction for diverted linked trips. Diverted linked trips reductions are generally not taken as some trips are diverted from a specific route and others are diverted to that same route thus cancelling each other's effect. In addition, diverted linked trips are considered new trips to the project site. These trips will cause traffic impacts on the State facilities when the project is developed. The combined vehicle trip reductions due to pass-by trips and diverted linked trips reduce the total vehicle trip generation by approximately 60% during weekday PM hours, such reduction seems excessive. Caltrans recommends that the diverted linked trips reduction be removed or reduced. We are open for discussions to clarify how these numbers were calculated.

The cumulative projects will generate 20,994 daily trips, 1,856/1,905 AM/PM peak hour trips. Many of those trips will utilize I-605 on and off ramps as well as the I-210 and I-10; therefore, this project may contribute to a cumulative significant traffic impact to State highway facilities in

Ms. Paula Kelly
 February 6, 2015
 Page 2 of 3

the future. The cumulative significant traffic impact may be unavoidable if no traffic mitigation is proposed. Decision makers should be aware of this issue and be prepared to help mitigate the potential cumulative traffic impacts on the State highway system. Caltrans is available to work with the City in identifying mitigation alternatives for cumulative traffic impacts.

On page 9 of the Traffic Impact Analysis prepared in November 2014, "The analysis addresses the Caltrans NOP comments, dated July 18, 2014; and is in accordance with the Los Angeles County Metropolitan Transportation Authority '2010 Congestion Management Project' (CMP)". In our view, CMP requirements do not adequately analyze the impact to the State Highway System, as it does not consider potential cumulative effect and safety. Consultation with Caltrans is needed when analyzing the freeway system.

Existing freeway segment volumes provided are based on Average Annual Daily Traffic (AADT) counts published by Caltrans in 2012. Generally, reasonable worst case scenario for the traffic data should be used for an existing freeway condition. We encourage the City to utilize the most recent traffic data available. Please contact Caltrans, we may be able to provide more recent data.

Tables BB,DD, FF analyzing freeway segments may need to be revised to reflect more recent volumes and adjusted trip assignments. Recent data from the PeMS system shows that LOS of I-605 segments analyzed is LOS D and E. Current data show that LOS of I-210 and I-10 is LOS "F" during the peak hours.

Existing and future LOS of I-605 segments listed below may need to be revised accordingly.

I-605 Freeway, Northbound

- 1. North of Arrow Highway
- 7. South of Live Oak Avenue

I-605 Freeway, Southbound

- 8. North of Arrow Highway
- 12. South of Arrow Highway

From Caltrans Guide for the Preparation of Traffic Impact Studies, December 2002, as a reminder, "The level of service (LOS) for operating State highway facilities is based upon measures of effectiveness (MOEs). Caltrans endeavors to maintain a target LOS at the transition between LOS 'C' and LOS 'D' on State highway facilities. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained." Continuing on page 9, the consultant provides an incorrect statement, "...for the purpose of this report, LOS D is used as the minimum level of service standard." The LOS threshold on State facilities can only be determined and agreed upon by the City and Caltrans. Otherwise, we recommend the City follow Caltrans' Guide.

Caltrans has concerns when an excessive amount of trips are assigned to off-ramps, thus causing congestion to the mainline, which in turn may lead to rear-end accidents. For the off-ramp queuing analysis, the off ramps should be analyzed utilizing the Highway Capacity Manual (HCM) queuing analysis methodology with the actual signal timings at the ramps' termini. Generally, the demand of the off-ramp should be calculated from the traffic counts, including the percentage of truck assignments to the ramp with a passenger car equivalent factor of 3.0 (worst

Ms. Paula Kelly
February 6, 2015
Page 3 of 3

case scenario). The analyzed result may need to be calibrated with actual signal timing when necessary. Please include mitigation measures if forecasted vehicle queues are expected to exceed 85% of the total available storage capacity such that the storage will allow a 15% safety factor.

We are aware that currently the City and Caltrans are planning to install a traffic signal and construct a second northbound right turn lane at the Northbound I-605 off-ramp to eastbound Live Oak Avenue; to install a traffic signal at the northbound I-605 off-ramp to westbound Live Oak Avenue; to provide a third westbound through lane on Live Oak Avenue by modifying the existing raised median; to construct a 2nd southbound left turn lane at southbound I-605 off-ramp to Arrow Highway including the necessary traffic signal modification. Table AA-Project Fair Share calculates a percentage of contribution at Intersection #9 I-605 Northbound Ramp/Live Oak Avenue. This percentage calculation may need to be revised. Please refer to Caltrans Guide for the Preparation of Traffic Impact Studies, December 2002, Appendix B, for an alternate fair share formula.

On February 4, 2015, Caltrans engineer, Mr. Alan Lin, City Engineer, Mr. William Tan, and LSA Associates, Inc agreed to meet to discuss potential traffic impacts and mitigation on these State facilities. In the Spirit of Mutual Cooperation, we look forward to working with the City in an effort to try to resolve the various issues raised in this letter. If you have any questions or wish to schedule a meeting, please feel free to contact Alan Lin the project coordinator at (213) 897-8391.

Sincerely,



RICK HOLLAND
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

**RESPONSE TO LETTER E
STATE CLEARINGHOUSE**

Response to Comment E-1. The City acknowledges receipt and distribution of the Draft EIR by the State Clearinghouse (SCH), and that the SCH received a comment letter from the California Department of Transportation, District 8, after the close of the Draft EIR public review period. The City thanks the Clearinghouse for its assistance in this regard.

NOTE: This comment does not result in any changes to the Draft EIR document.

3. EIR ERRATA AND ADDITIONS

Any corrections to the Draft Environmental Impact Report (EIR) text and figures generated either from responses to comments or independently by the City, are stated in this section of the Final EIR. These EIR errata are provided to clarify, refine, and provide supplemental information for the Irwindale Regional Shopping Center. Changes are corrections to the text of the original Draft EIR. None of the information contained in these EIR modifications constitutes significant new information or changes to the analysis or conclusions of the Draft EIR.

The information included in this EIR erratum that resulted from a typographical error does not constitute substantial new information that requires recirculation of the Draft EIR. The California Environmental Quality Act (CEQA) Guidelines, Section 15088.5, states in part:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:
 - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
 - (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The changes to the Draft EIR included in these EIR modifications do not constitute “significant” new information because:

- No new significant environmental impact would result from the project or from a new mitigation measure;
- There is no substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the identified significant impacts to a level of insignificance;
- No feasible project alternative or mitigation measure considerably different from others previously analyzed has been proposed or identified that would clearly lessen the significant environmental impacts of the project; and

- The Draft EIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment were precluded.

Therefore, recirculation of the Draft EIR is not required because the new information added to the EIR through these modifications clarifies information already provided or makes insignificant modifications to the already adequate Draft EIR.

For simplicity, the EIR modifications contained in the following pages are in the same order as the information appears in the Draft EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by a double underline (underline) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference.

IMPORTANT NOTE: *The following sections indicate a minor change to the EIR which is typographical in nature. It is important to note that these changes do not indicate any deficiency in the EIR in terms of CEQA compliance.*

SECTION 1.0 EXECUTIVE SUMMARY

Table 1.B: Irwindale Regional Shopping Center Environmental Summary (page 1-31)

4.5 HYDROLOGY AND WATER QUALITY		
Potentially Significant Impacts		
<p><u>Impact 4.5.6.1 Construction-Related Water Quality Impacts:</u> The construction and grading phases of the project site would require temporary disturbance of surface soils and removal of vegetative cover which could potentially result in erosion and sedimentation on site. This is a significant impact requiring mitigation.</p>	<p>4.5.6.1B Prior to issuance of a grading permit, the developer shall submit to the Los Angeles Regional Water Quality Control Board (LARWQCB) and receive approval for a project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the SWPPP shall emphasize structural and nonstructural best management practices (BMPs) to control sediment and non-visible discharges from the site. BMPs to be implemented may include (but shall not be limited to) the following:</p> <ul style="list-style-type: none"> • Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the BMPs are to be periodically inspected by the RWQCB during construction and repairs would be made as required. • Materials that have the potential to contribute non-visible pollutants to storm water must not be placed in drainage 	<p>Less than Significant</p>

	<p>ways and must be placed in temporary storage containment areas.</p> <ul style="list-style-type: none"> • All loose soil, silt, clay, sand, debris, and other earthen material shall be controlled to eliminate discharge from the site. Temporary soil stabilization measures to be considered include: covering disturbed areas with mulch, temporary seeding, soil stabilizing binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Stockpiles shall be surrounded by silt fences and covered with plastic tarps. • The SWPPP shall include inspection forms for routine monitoring of the site during the construction phase. • Additional required BMPs and erosion control measures shall be documented in the SWPPP. • The SWPPP would be kept on site for the duration of project construction and shall be available to the local Regional Water Quality Control Board for inspection at any time. <p>The developer and/or construction contractor for each development area shall be responsible for performing and documenting the application of BMPs identified in the project-specific SWPPP. Regular inspections shall be performed on sediment control measures called for in the SWPPP. Monthly reports shall be maintained and available for City inspection. An inspection log shall be maintained for the project and shall be available at the site for review by the City of San Gabriel <u>Irwindale</u> and the Regional Water Quality Control Board</p>	
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4.5 HYDROLOGY AND WATER QUALITY

Mitigation Measures (page 4.5-22)

4.5.6.2B Prior to issuance of a grading permit, the developer shall submit to the Los Angeles Regional Water Quality Control Board (LARWQCB) and receive approval for a project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the SWPPP shall emphasize structural and nonstructural best management practices

(BMPs) to control sediment and non-visible discharges from the site. BMPs to be implemented may include (but shall not be limited to) the following:

- Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the BMPs are to be periodically inspected by the RWQCB during construction and repairs would be made as required.
- Materials that have the potential to contribute non-visible pollutants to storm water must not be placed in drainage ways and must be placed in temporary storage containment areas.
- All loose soil, silt, clay, sand, debris, and other earthen material shall be controlled to eliminate discharge from the site. Temporary soil stabilization measures to be considered include: covering disturbed areas with mulch, temporary seeding, soil stabilizing binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Stockpiles shall be surrounded by silt fences and covered with plastic tarps.
- The SWPPP shall include inspection forms for routine monitoring of the site during the construction phase.
- Additional required BMPs and erosion control measures shall be documented in the SWPPP.
- The SWPPP would be kept on site for the duration of project construction and shall be available to the local Regional Water Quality Control Board for inspection at any time.

The developer and/or construction contractor for each development area shall be responsible for performing and documenting the application of BMPs identified in the project-specific SWPPP. Regular inspections shall be performed on sediment control measures called for in the SWPPP. Monthly reports shall be maintained and available for City inspection. An inspection log shall be maintained for the project and shall be available at the site for review by the ~~City of San Gabriel~~ Irwindale and the Regional Water Quality Control Board.

4. MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

This Mitigation Monitoring and Reporting Program has been prepared for use in implementing mitigation for the:

Irwindale Regional Shopping Center Project

The program has been prepared in compliance with State law and the Irwindale Regional Shopping Center Environmental Impact Report (EIR) (State Clearinghouse No. 2014071042) prepared for the project by the City of Irwindale.

The California Environmental Quality Act (CEQA) requires adoption of a reporting or monitoring program for those measures placed on a project to mitigate or avoid adverse effects on the environment (Public Resource Code Section 21081.6). The law states that the reporting or monitoring program shall be designed to ensure compliance during project implementation.

The monitoring program contains the following elements:

- 1) The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify implementation of several mitigation measures.
- 2) A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
- 3) The program has been designed to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program. As changes are made, new monitoring compliance procedures and records will be developed and incorporated into the program.

This Mitigation Monitoring and Reporting Program includes mitigation identified in the Final EIR.

4.2 MITIGATION MONITORING AND RESPONSIBILITIES

As the Lead Agency, the City of Irwindale is responsible for ensuring full compliance with the mitigation measures adopted for the proposed project. The City will monitor and report on all mitigation activities. Mitigation measures will be implemented at different stages of development throughout the project area. In this regard, the responsibilities for implementation have been assigned to the Applicant, Contractor, or a combination thereof. If during the course of project implementation, any of the mitigation measures identified herein cannot be successfully implemented, the City shall be immediately informed, and the City will then inform any affected responsible agencies. The City, in conjunction with any affected responsible agencies, will then determine if modification to the project is required and/or whether alternative mitigation is appropriate.

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
in the project plans and specifications.		development.			Withhold Certificate of Occupancy
<p>4.1.6.1C The project applicant shall demonstrate to the City that the number, nature, and location of any bicycle parking area(s) has been established through consultation with the City, local bicycle organizations, and/or through implementation of the bicycle parking standard for a similarly sized project. The project's bicycle parking facilities shall be reviewed and approved by the City prior to the issuance of building permits. Factors that may be considered in the determination of required bicycle parking area(s) include (but shall not be limited to) convenience, security, safety, the adjacency of other bicycle facilities, and anticipated usage.</p> <p>The number, location, and nature of any bicycle parking feature shall be included in the project plans and specifications.</p>	<p>Building and Safety Department</p> <p>Building and Safety and Planning Departments</p>	<p>Prior to Issuance of building permits</p> <p>Prior to Issuance the Certificate of Occupancy for each phase of development.</p>	<p>The building plans shall indicate the placement of bicycle parking areas</p> <p>Field verification</p>		<p>Withhold building permit</p> <p>Withhold Certificate of Occupancy</p>
<p>4.1.6.1D Prior to the issuance of the first Certificate of Occupancy, the project applicant shall prepare and submit to the City for review and approval, a Transportation Demand Management (TDM) Plan that identifies measures to reduce the percentage of individual-driver vehicle trips to the proposed development. The target vehicle trip reduction addressed in the TDM Plan shall be established through discussion with the City. Specific measures included in the plan shall include, but shall not be limited to:</p> <ul style="list-style-type: none"> • Installation and maintenance of an appropriate number of public transit 	City Engineer	Prior to Issuance the Certificate of Occupancy for first building within each phase of development.	Review of a TDM plan.		Withhold Certificate of Occupancy.

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>facilities;</p> <ul style="list-style-type: none"> • Installation and maintenance of an appropriate number of bicycle parking facilities; • Participation in local and regional employee carpool/ride share matching services; • Providing preferential parking to carpool/ride share parking; and • Requirements for on-site employer to provide carpool/ride share/public transit information to employees. <p>Factors that may be considered in the development of TDM measures include (but shall not be limited to) the proximity of local and regional transit features, the demographics and residency of project site employees, the number of employers participating in TDM Plan measures, and the proximity of pedestrian and bicycle facilities. The TDM Plan shall identify how the specific measures are anticipated to reduce single-occupancy vehicle trips to the project site. On or prior to the anniversary of the issuance of the first Certificate of Occupancy, the project applicant shall submit to the City for review, a report that provides a summary of effectiveness of the TDM Plan measures. Effectiveness may be measured by increases in public transit usage, increased participation in carpool/ride share programs, increased retail visits and a corresponding reduction in parking lot usage, or other reasonable measure. Upon annual review by the City, the project applicant shall revise the TDM to reflect additional measures to reduce single-</p>					

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
occupant vehicle trips to the project site.					
4.1.6.1E The project shall include signage at delivery/loading areas that state delivery truck idling shall be limited to two minutes or less.	Building and Safety and Planning Departments Planning Department	Prior to Issuance of building permits Prior to Issuance the Certificate of Occupancy for each phase of development.	The building plans shall indicate the placement of signage. Field verification		Withhold building permit Withhold Certificate of Occupancy.
4.1.6.1F The project applicant shall designate two (2) percent of total parking spaces for electric vehicle parking and charging in preferential locations. These parking and charging locations shall be reviewed and approved by the City prior to the issuance of building permits and shall be included in the plans and specifications for the project.	Building and Safety and Planning Departments Planning Department	Prior to Issuance of building permits Prior to Issuance the Certificate of Occupancy for each phase of development.	The building plans shall indicate parking spaces and charging stations for electric vehicles. Field verification		Withhold building permit Withhold Certificate of Occupancy.
BIOLOGICAL RESOURCES					
BIO-1. To ensure compliance with California Fish and Game Code and the MBTA, and to avoid potential impacts to nesting birds, the proposed project site shall be cleared of vegetation outside the general bird nesting season (February 1 through August 31). If vegetation cannot be removed outside the bird nesting season, a pre-construction nesting bird survey by a qualified biologist is required prior to vegetation removal. Should nesting birds be found, an exclusionary buffer shall be established by the biologist. This buffer shall be clearly marked in the field by construction personnel under guidance of the biologist, and construction or clearing	Planning Department	Prior to issuance of grading permits or grubbing for each phase of development.	City verifies that construction/grading documents include required language.		Withhold grading permits

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
shall not be conducted within this zone until the biologist determines that the young have fledged or the nest is no longer active.					
GEOLOGY AND SOILS					
4.2.6.1A Prior to the issuance of a building permit, the developer shall submit supplemental geotechnical/soils assessment(s) to the City of Irwindale for review and approval. The assessment(s) shall address the potential for differential settlement and other on-site geologic/soil conditions, and shall identify site-specific grading techniques; required soil improvement efforts/methodology; foundation, utility, and storm drain design requirements; and building specifications to reduce the potential for differential settlement and other geotechnical hazards to levels within those specified in the California Green Building Code and/or other applicable Code(s).	City Engineer	Prior to issuance of building permit	City review and approval of supplemental geotechnical/soils assessment		Withhold building permit
4.2.6.1B Prior to the commencement of any on-site construction or earthmoving activity, the developer shall submit to the City of Irwindale for review and approval evidence that the specific grading techniques, foundation/utility/storm drain design, and building specifications detailed in any supplemental geotechnical/soil investigation required under Mitigation Measure 4.2.6.1A, have been appropriately incorporated into the project's construction documents.	City Engineer and Building and Safety Official	Prior to issuance of grading permit.	City review and approval of supplemental geotechnical/soils assessment		Withhold grading permit
GREENHOUSE GASES AND GLOBAL CLIMATE CHANGE					
4.3.6.1A Construction and Building Materials. Prior to issuance of the first	Building and Safety Official	Prior to issuance of first certificate of	City verifies that all required activities have		Withhold first certificate of

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>Certificate of Occupancy for each phase of development, the project applicant shall demonstrate that the following activities have been incorporated into the project and are shown as appropriate in the project plan:</p> <ul style="list-style-type: none"> • Divert by recycling at least 50 percent of the demolished and/or grubbed construction materials (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). • Use locally produced and/or manufactured building materials for construction of the project; • Recycle/reuse demolished construction material; and • Use “Green Building Materials,” such as those materials which are resource efficient, and recycled and manufactured in an environmentally friendly way, including low Volatile Organic Compound (VOC) materials. 		occupancy	been incorporated into the project through review of building plans and construction documents.		occupancy
<p>4.3.6.1B Passive Solar Design Elements. Prior to final development map/plan approval, the applicant shall submit to the Irwindale Planning Department for review and approval a building plan that incorporates the following passive solar design elements:</p> <ul style="list-style-type: none"> • Proper building orientation to take advantage of the sun, shade, and wind; • Thermal mass materials, such as tile or brick, used in flooring or walls, especially south-facing walls, to store the sun’s heat during the day and 	Building and Safety and Planning Departments	Prior to issuance of building permit	City review of building site plans and building plans.		Withhold building permit

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>release it back into the building at night or when the temperature drops;</p> <ul style="list-style-type: none"> Insulation of both the ceilings and walls; Passive solar design techniques such as large south and west-facing windows with proper window overhangs and/or reflective window film to improve heating and cooling of the building naturally, reducing the need for artificial heating or cooling mechanisms; and A daylighting system to integrate daylight effectively with electrical lighting systems to reduce electricity consumption when sufficient daylight is present within the building. 					
<p>4.3.6.1C Energy Efficiency Measures. Prior to the final development map/plan approval, the applicant shall submit to the Irwindale Planning Department for review and approval a building plan which requires and/or incorporates the following:</p> <ul style="list-style-type: none"> Water heating equipment which includes integral automatic temperature controls and circulating service water system controls such as geothermal heat pumps (Geothermal heat pumps provide heating, cooling, and hot water, and are generally more efficient and less expensive to operate and maintain than conventional systems.); The installation of lighting systems with automatic time switch controls, 	Building and Safety and Planning Departments	Prior to issuance of building permit	City review of building plans.		Withhold building permit

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>occupant-sensing devices such as motion detectors, automatic daylighting controls, dimmers, indoor photo sensors, and efficient security, street, and parking lot lighting (e.g. high pressure low sodium fixtures);</p> <ul style="list-style-type: none"> The use of alternative energy sources such as photovoltaic (i.e., solar electric) systems on all building rooftops to reduce the projects electrical energy consumption; and The use of alternative building materials that contain post-consumer recycled materials to the greatest extent possible. 					
<p>4.3.6.1D Energy Management Design Systems. Prior to final development map/plan approval, the applicant shall submit to the Irwindale Planning Department for review and approval a building plan which incorporates energy management systems to control space conditioning or HVAC systems including operating hours, set point, scheduling of chillers, etc.</p>	Building and Safety and Planning Departments	Prior to issuance of building permit	City review of building plans.		Withhold building permit
<p>4.3.6.1E Landscape Design Plan. Prior to final development map/plan approval, the applicant shall submit to the Irwindale Planning Department for review and approval a landscape design plan which integrates heat island minimization, xeriscape principles (i.e., landscaping that reduces or eliminates the need for supplemental water), and native drought-tolerant plants.</p>	Planning Department	Prior to issuance of building permit	City review of landscaping plans.		Withhold building permit

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>4.3.6.1F Water Conservation and Efficiency Measures. To the satisfaction of the City, the following measures shall be incorporated into the design and construction of the project:</p> <ul style="list-style-type: none"> • Devise a comprehensive water conservation strategy appropriate for the project and location. The strategy may include the following, plus other innovative measures that might be appropriate; • Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls; • Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets, dual-flush toilets and waterless urinals; • Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff; and • Install a separate, non-potable distribution system to accommodate the potential future use of recycled water for landscape irrigation needs of large areas with irrigated landscaping. 	Building and Safety and Planning Departments	Prior to issuance of building permit	City review of building and landscape plans.		Withhold building permit
<p>4.3.6.1G LEED Certification. As defined by the LEED Program of the United States Green Building Council, the project design shall qualify for a minimum of “LEED Certified” designation. Prior to occupancy or use of the new project buildings, the applicant shall provide evidence to the Irwindale Planning Department that an</p>	Building and Safety and Planning Departments	Prior to issuance of Certificate of Occupancy	Applicant to provide written evidence to the City that an LEED Certified designation has been met.		Withhold Certificate of Occupancy

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
LEED Certified designation has been met.					
HAZARDS					
<p>4.4.6.1A Prior to the demolition of any structure that has the potential to contain asbestos-containing materials, an inspection for Asbestos Containing Building Materials (ACM) shall be conducted by a California Site Surveillance Technician (CSST) registered by the California Division of Occupational Health and Safety (CalOSHA) for ACM. The purpose of the ACM inspection is to locate and identify suspected ACM that will be affected during the demolition portion of the project. Once a visual inspection is performed, representative asbestos samples (if present) shall be collected in accordance with the U.S. EPA established guidelines document, "Guidance for Controlling Asbestos-Containing Materials in Buildings" (U.S. EPA 560/5-85-024, 1985) and U.S. EPA 40 CFR Part 763, "Asbestos-Containing Materials in Schools, Final Rule." After sampling, ACM shall be abated/removed from the project site by a California State Registered Asbestos Abatement Contractor registered by the Division of Occupational Health and Safety (OSHA) in accordance with the California Administrative Code, Title 8, and article 2.5. and in adherence to the South Coast Air Quality Management District (SCAQMD) Asbestos Hazard Emergency Response Act (AHERA) pursuant to CFR Chapter 40, Part 763, subpart E.</p>	Building and Safety Department	Prior to demolition of existing onsite structures.	<p>City verifies written documentation that an ACM by a CCST has been conducted.</p> <p>City is provided written documentation that any ACM has been abated and disposed of in accordance with state law.</p>		Withhold demolition permits
<p>4.4.6.1B Prior to issuance of a grading permit, the applicant and the City shall</p>	Building and Safety Department	Prior to issuance of grading permit	City verifies written documentation that a		Withhold grading permit

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>meet with representatives of the Los Angeles County Department of Public Works (LACDPW) and South Coast Air Quality Management District (SCAQMD) to develop an appropriate methane gas protection system for the new commercial uses proposed on the project site. This system shall be designed by a qualified civil engineer with experience designing such systems, to the satisfaction of the LACDPW and SCAQMD. The protection system shall be approved by the LACDPW and SCAQMD prior to issuance of a grading permit for the proposed project, to the satisfaction of the City Public Works Department.</p>			<p>methane gas protection system has been approved by LACDPW and SCAQMD.</p>		
<p>4.4.6.1C During grading, a methane gas protection and monitoring system shall be installed beneath each new commercial building of the project. This system shall be designed and installed to the satisfaction of the Los Angeles County Department of Public Works (LACDPW) and the South Coast Air Quality Management District (SCAQMD) per Mitigation Measure 4.4.6.1B.</p>	<p>Building and Safety Department</p>	<p>During site grading</p>	<p>Field inspection during grading.</p>		<p>Stop work order is issued.</p>
<p>4.4.6.1D Prior to issuance of the first occupancy permit, the applicant shall demonstrate that the methane gas protection system has been installed and is operating per design specifications.</p>	<p>Building and Safety Department</p>	<p>Prior to issuance of first Certificate of Occupancy.</p>	<p>Field inspection</p>		<p>Withhold Certificate of Occupancy</p>
<p>4.4.6.1E After issuance of an occupancy permit for all buildings within the project, the methane gas system shall be monitored regularly (at least weekly for the first two months, then at least monthly for the first year, then at least quarterly) and</p>	<p>City Engineer</p>	<p>Weekly for first 2 months Monthly for first</p>	<p>Written report on methane gas monitoring shall be submitted to the City Engineer.</p>		<p>Temporary evacuation or limited occupancy of the building.</p>

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>written results provided to the City Public Works Department. Any measurements over 1 percent shall be reported immediately to the City and the Los Angeles County Department of Public Works (LACDPW) and the South Coast Air Quality Management District (SCAQMD) for appropriate action and additional monitoring. Any measurements over 3 percent shall be reported immediately to the City, the LACDPW, and the SCAQMD and the City shall take appropriate action, which may include but not be limited to temporary evacuation or limited occupancy of the building or buildings with elevated methane readings. Elevated methane readings over more than 2 monitoring periods will be grounds to require inspection and possible repair of the methane monitoring system, to the satisfaction of the City, the LACDPW, and the SCAQMD.</p>		<p>year</p> <p>Quarterly</p>			
<p>4.4.6.1F Prior to issuance of a grading permit, the applicant shall retain a certified hazardous materials waste hauler to collect, haul away, and dispose of all on-site materials that may be potentially hazardous including, but not limited to, underground tanks, aboveground tanks, and storage drums related to current Speedway activities. The disposal of these materials and facilities shall be conducted in accordance with all Federal, State, and local regulations associated with the removal, hauling, and disposal of hazardous materials.</p>	<p>Building and Safety Department</p>	<p>Prior to issuance of demolition permit</p>	<p>Written verification the applicant has retained a certified hazardous materials waste hauler to collect.</p>		<p>Withhold demolition permit</p>

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
HYDROLOGY, DRAINAGE, AND WATER QUALITY					
<p>4.9.6.1A Prior to issuance of any grading permit, the project developer shall file a Notice of Intent (NOI) with the Los Angeles Regional Water Quality Control Board (LARWQCB) to be covered under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of storm water associated with construction activities. The project developer shall submit to the City the Waste Discharge Identification Number issued by the State Water Quality Control Board (SWQCB) as proof that the project's NOI is to be covered by the General Construction Permit that has been filed with the SWQCB. This measure shall be implemented to the satisfaction of the City Engineer.</p>	City Engineer	Prior to issuance of grading permit	City verifies developer has filed a NOI with the LA RWQCB per state requirements		Withhold grading permit
<p>4.5.6.1B Prior to issuance of a grading permit, the developer shall submit to the Los Angeles Regional Water Quality Control Board (LARWQCB) and receive approval for a project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the SWPPP shall emphasize structural and nonstructural best management practices (BMPs) to control sediment and non-visible discharges from the site. BMPs to be implemented may include (but shall not be limited to) the following:</p> <ul style="list-style-type: none"> • Sediment discharges from the site may 	City Engineer	Prior to issuance of grading permit	City verifies developer has a SWPPP approved by the LA RWQCB per state requirements		Withhold grading permit

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>be controlled by the following: sandbags, silt fences, straw wattles and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the BMPs are to be periodically inspected by the RWQCB during construction and repairs would be made as required.</p> <ul style="list-style-type: none"> • Materials that have the potential to contribute non-visible pollutants to storm water must not be placed in drainage ways and must be placed in temporary storage containment areas. • All loose soil, silt, clay, sand, debris, and other earthen material shall be controlled to eliminate discharge from the site. Temporary soil stabilization measures to be considered include: covering disturbed areas with mulch, temporary seeding, soil stabilizing binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Stockpiles shall be surrounded by silt fences and covered with plastic tarps. • The SWPPP shall include inspection forms for routine monitoring of the site during the construction phase. • Additional required BMPs and erosion control measures shall be documented in the SWPPP. • The SWPPP would be kept on site for the duration of project construction and shall be available to the local Regional Water Quality Control Board for 					

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>inspection at any time.</p> <p>The developer and/or construction contractor for each development area shall be responsible for performing and documenting the application of BMPs identified in the project-specific SWPPP. Regular inspections shall be performed on sediment control measures called for in the SWPPP. Monthly reports shall be maintained and available for City inspection. An inspection log shall be maintained for the project and shall be available at the site for review by the City of Irwindale and the Regional Water Quality Control Board.</p>	City Engineer	During grading and building on site.	Field inspection		
<p>4.5.6.2A Upon completion of each phase of development within the project, the developer shall provide evidence that the long-term BMPs outlined in the project's SUSMP have been fully implemented. As determined appropriate by the City, the applicant shall include information related to planned maintenance of BMP features. This measure shall be implemented to the satisfaction of the City Public Works Department and Planning Division.</p>	City Public Works Department and Planning Division	Upon completion of each phase of development	City verifies developer has received approval of a SUSMP from the LA RWQCB per state requirements.		Withhold Certificate of Occupancy
TRANSPORTATION					
<p>4.7.6.1A Prior to issuance of certificates of occupancy for the first phase of development, the project applicant shall install a traffic signal at the Driveway 1/Live Oak Avenue intersection. The traffic signal improvement plans shall be reviewed and approved by the City of Irwindale Public Works Department. This measure shall be</p>	City Engineer	Prior to issuance of certificates of occupancy for the first phase of development.	City reviews and approves street plans		Withhold Certificate of Occupancy

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
implemented to the satisfaction of the City Public Works Director.					
<p>4.7.6.1B Prior to issuance of Certificates of Occupancy for the first phase of development, the project applicant shall install a traffic signal at the Driveway 3/Live Oak Avenue intersection. The traffic signal improvement plans shall be reviewed and approved by the City of Irwindale Public Works Department. This measure shall be implemented to the satisfaction of the City Public Works Director.</p>	City Public Works Director	Prior to issuance of certificates of occupancy for the first phase of development.	City reviews and approves street plans		Withhold Certificate of Occupancy
<p>4.7.6.1C Prior to the issuance of the first Certificate of Occupancy for the first phase of development, the project applicant shall make a fair-share contribution to the following circulation improvements and these improvements shall be in place:</p> <ul style="list-style-type: none"> I-605 Northbound Off-Ramps/Live Oak Avenue: Install a traffic signal and add a second northbound right-turn lane. It should be noted that these improvements are a joint improvement project between Caltrans and the City of Irwindale and preparation of the engineering design and environmental documentation is currently underway. It is anticipated that these improvements will be completed in 2016 and in operation prior to the opening year of the project. <p>The fair-share contribution shall be calculated based on the project's share of the existing plus project traffic volume during the peak hour on a weekday or weekend. The highest fair-share percentage is 25.4 percent during the</p>	City Engineer	Prior to issuance of certificates of occupancy for the first phase of development.	The developer provides the City with written documentation that the fair share contribution for the stated circulation improvements has been made.		Withhold Certificate of Occupancy

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
Saturday peak hour. This measure shall be implemented to the satisfaction of the City Public Works Department.					
<p>4.7.6.2A Prior to the issuance of the first certificate of occupancy for the project, the developer shall make fair-share contributions to the following circulation improvements:</p> <ul style="list-style-type: none"> Arrow Highway/Live Oak Avenue: Add an eastbound through lane. It should be noted, to accommodate a third eastbound through lane, on-street parking will be prohibited. <p>The fair-share contribution shall be calculated based on the project's share of the existing plus project traffic volume during the peak hour on a weekday or weekend. The highest fair-share percentage is 1.9 percent during the Saturday peak hour. This measure shall be implemented to the satisfaction of the City Public Works Department.</p>	City Engineer	Prior to issuance of certificates of occupancy for the first phase of development.	The developer provides the City with written documentation that the fair share contribution for the stated circulation improvements has been made.		Withhold Certificate of Occupancy
<p>4.7.6.2B Prior to the issuance of the first certificate of occupancy for the project, the developer shall make fair-share contributions to the following circulation improvements:</p> <ul style="list-style-type: none"> Avenida Barbosa/Arrow Highway: Add a second eastbound left-turn lane. <p>The fair-share contribution shall be calculated based on the project's share of the existing plus project traffic volume during the peak hour on a weekday or weekend. The highest fair-share percentage is 41.1 percent during the</p>	City Engineer	Prior to issuance of certificates of occupancy for the first phase of development.	The developer provides the City with written documentation that the fair share contribution for the stated circulation improvements has been made.		Withhold Certificate of Occupancy

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
Saturday peak hour. This measure shall be implemented to the satisfaction of the City Public Works Department.					
4.7.6.3A Prior to issuance of occupancy permits, the developer shall install bike racks and provide showers and locker rooms for employees who wish to ride bicycles to work. Bike racks shall also be installed for retail customers in appropriate locations. An appropriate number of bike racks shall be located near each building to serve the anticipated number of employees and customers. This measure shall be implemented to the satisfaction of the City Engineer.	Building and Safety and Planning Departments City Engineer Planning Department	Prior to Issuance of building permits Prior to Issuance the Certificate of Occupancy for each phase of development.	The building plans shall indicate bike racks and showers and locker rooms. Field verification		Withhold building permit Withhold Certificate of Occupancy.
4.7.6.3B Prior to issuance of the first building permit, the project plans shall be circulated to Foothill Transit (FT) and the Metropolitan Transit Authority (MTA) to determine if there is a need for a bus stop on the south side of Live Oak Avenue in front of the project site (i.e., for either FT Route 270, 272 and 492). If either agency determines a need for such a stop, the developer shall install a bus stop to agency specifications prior to issuance of occupancy permits. This measure shall be implemented for each phase to the satisfaction of the City Engineer.	Building and Safety Department City Engineer	Prior to Issuance of first building permit. Prior to Issuance the Certificate of Occupancy for each phase of development.	The building plans shall be routed to Foothill Transit (FT) and the Metropolitan Transit Authority (MTA) for review. Field verification		Withhold building permit Withhold Certificate of Occupancy.

