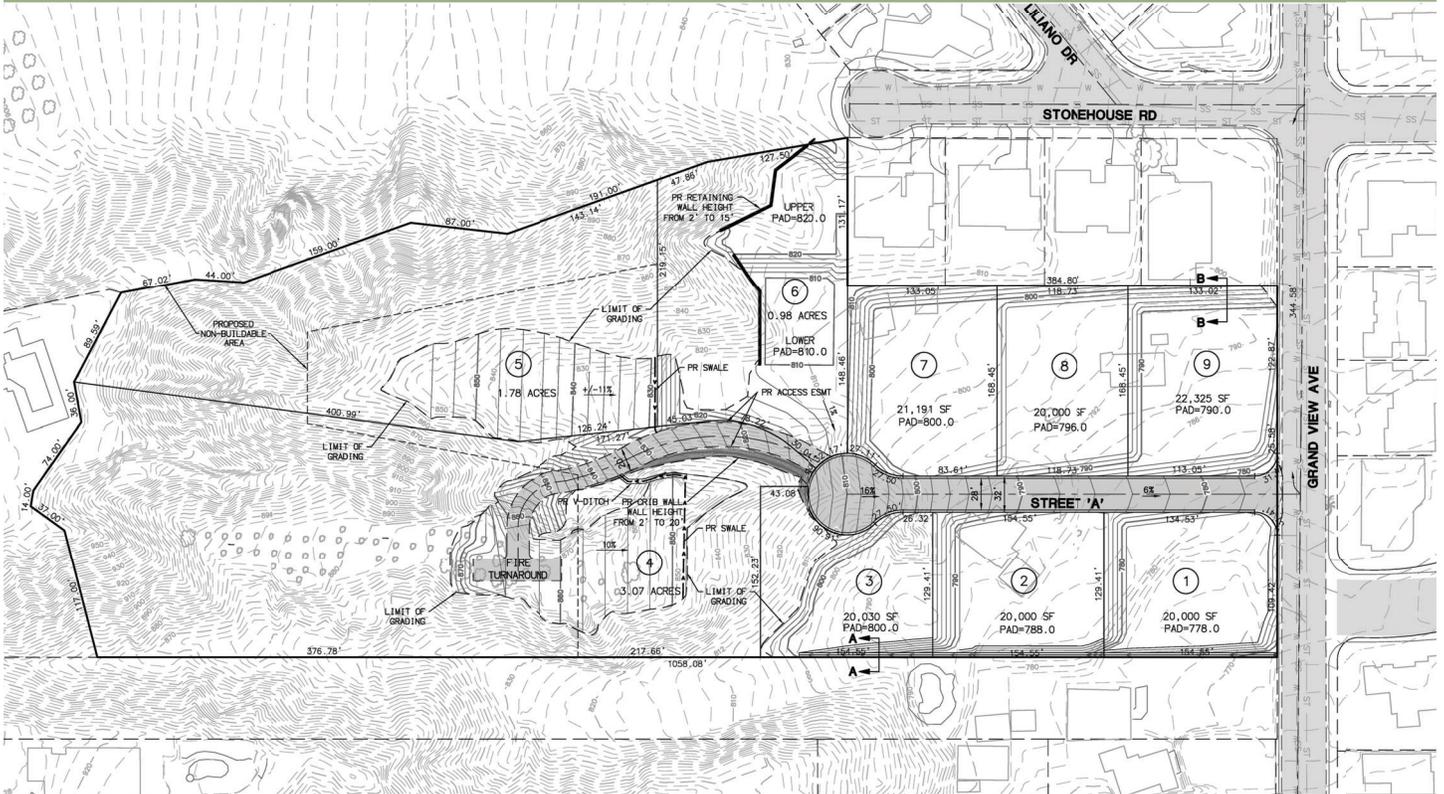


FINAL | DECEMBER 2025
ENVIRONMENTAL IMPACT REPORT
SCH No. 2023100084



GINKGO STONEHOUSE RESIDENTIAL PROJECT

LEAD AGENCY:

City of Sierra Madre
232 West Sierra Madre Boulevard
Sierra Madre, California 91024
Contact: Clare Lin
Director of Planning & Community Preservation Department
626.355.7138

PREPARED BY:

VCS Environmental
30900 Rancho Viejo Road, Suite 100
San Juan Capistrano, California 92675
Contact: Eric Turner
Director of Environmental Services
949.489.2700



FINAL

ENVIRONMENTAL IMPACT REPORT

State Clearinghouse No. 2023100084

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Residential Project**



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DECEMBER 2025

This document has been set up for double-sided printing in order to conserve natural resources.

TABLE OF CONTENTS

Section 1.0:	Introduction.....	1-1
	1.1 Introduction	1-1
	1.2 Format of the Final EIR.....	1-1
	1.3 CEQA Requirements Regarding Comments and Responses.....	1-2
Section 2.0:	Response to Comments	2-1
Section 3.0:	Errata.....	3-1
	3.1 Introduction	3-1
	3.2 Revisions to the Draft EIR.....	3-1
Section 4.0:	Mitigation Monitoring and Reporting Program.....	4-1

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SECTION 1.0 INTRODUCTION

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

According to the CEQA Guidelines, Section 15132 (Contents of Final Environmental Impact Report), the FEIR shall consist of:

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

This document contains responses to comments received on the DEIR for the Ginkgo Stonehouse Residential Project (State Clearinghouse Number [SCH No.] 2023100084) during the public review period, which began July 15, 2025 and closed August 29, 2025. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

The DEIR for the proposed Ginkgo Stonehouse Residential Project (herein referenced as the Project) was distributed to responsible and trustee agencies, interested groups, and organizations. The DEIR was made available for public review and comment for a period of 45 days. The public review period for the DEIR established by the CEQA Guidelines commenced on July 15, 2025 and ended August 29, 2025.

1.2 FORMAT OF THE FINAL EIR

The FEIR is organized into the following sections:

- **Section 1.0, Introduction:** Provides CEQA compliance information.
- **Section 2.0, Response to Comments:** This section includes a list of all correspondence submitted to the City of Sierra Madre on the DEIR, each identified by a letter for later reference, together with the authors and the dates the letters were issued. Following this list, all of the letters are presented, with numbered brackets to highlight specific comments that are responded to in the next section.
- **Section 3.0, Errata:** This section identifies revisions to the DEIR to incorporate clarifications developed in response to comments on the DEIR. Additions to the text are underlined and deletions have been stricken through. None of the changes presented in the Errata present new information that would result in significant changes that either changes the conclusions of the analysis presented in the DEIR or is regarded as significant new information that would result in recirculation of the DEIR pursuant to Section 15088.5(b) (Recirculation of an EIR Prior to Certification) of the CEQA Guidelines.

- **Section 4.0, Mitigation Monitoring and Reporting Program:** This section ensures that the mitigation measures identified in the DEIR for the proposed Project are implemented.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

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

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

In accordance with CEQA, Public Resources Code Section 21092.5 (Proposed Response to Public Agency Comments Received by Lead Agency; Notice to Agency Commenting on Negative Declaration; Untimely Comments), copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report.

The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

SECTION 2.0 RESPONSE TO COMMENTS

Section 15088 (Evaluation of and Response to Comments) of the CEQA Guidelines requires the Lead Agency (City of Sierra Madre) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft Environmental Impact Report (DEIR) and prepare written responses.

This section provides all written responses received on the DEIR and the City’s responses to each comment.

Comment letters are assigned a reference number and specific comments are each assigned a reference number. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions in Section 3.0, *Errata*, of this Final Environmental Impact Report (FEIR).

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period. Note, Comment Letter No. 6 was received after the public comment review period had concluded but was incorporated into this FEIR.

Reference Number	Date of Comment	Commenting Agency/Person
1	7/26/2025	Luaine Scheliga
2	8/14/2025	The Metropolitan Water District of Southern California
3	8/20/2025	California Department of Transportation (Caltrans) District 7
4	8/25/2025	California Department of Fish and Wildlife (CDFW)
5	8/28/2025	Debora Sheridan
6	12/04/2025	Jean Pfaffinger

COMMENT LETTER NO. 1

From: luaine lee [REDACTED]
Sent: Saturday, July 26, 2025 5:45 PM
To: EIR Comments <eircomments@sierramadrea.gov>
Subject: [EXTERNAL] 935 and 965 e. grand view

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and

the city does not need 9 custom homes added to the already stressed water and electricity resources. nor does it require the additional traffic and parking problems that already exist in sierra madre. will the city council consider the environmental value of sierra madre over the monetary value? it seems that no matter when the citizens desire, the council approves every money-making scheme. the town is prized because of its rustic and placid environment. let's keep it that way.

1-1

1-2

Luaine Scheliga

Response No. 1

Luaine Scheliga
Resident
July 26, 2025

Comment 1-1: Commenter expresses concern about the construction of 9 homes and potential impacts related to water and electricity resources as well as to existing traffic and parking problems in Sierra Madre and questions whether the City Council will prioritize environmental values over monetary considerations.

Response: Regarding water resources, the DEIR (pages 5.19-18 through 5.19-19) analyzed the Project's potential impacts on water resources and determined that the Sierra Madre Water District (SMWD) has adequate water supply to meet demands from 2025 to 2045 under all potential conditions including the Normal Year Supply, the Single Dry Year Supply, and the Multiple Dry Years Supply scenarios. The City of Sierra Madre Urban Water Management Plan (UWMP) also identifies that there would be adequate water supplies for the proposed Project and 100% reliability during a normal wet year, a single dry year, and multiple dry years between 2025 and 2045. The Project's Water Study (DEIR, Appendix I2) also indicates that the Project's proposed development would have adequate water supply. The Project would also reduce water demand by complying with the requirements of CAL Green and the City of Sierra Madre Municipal Code. Potential impacts associated with providing adequate water supplies to the Project were determined to be less than significant.

Regarding energy resources (specifically electricity), the DEIR (pages 5.19-17 through 5.19-18) analyzed the Project's potential impacts on electrical service and determined that the Project's addition of 5 residential homes (nine total homes) is not expected to notably impact Southern California Edison's service capabilities. The Project would comply with all federal, state, and county requirements related to the consumption of electricity, which includes CCR Title 24, Part 6 *Building Energy Efficiency Standards* and CCR Title 24, Part 11: *California Green Building Standards*. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed residences, including enhanced insulation, use of energy efficient lighting and appliances as well as requiring a variety of other energy efficiency measures to be incorporated into the development. Therefore, the Project would be designed and built to minimize electricity use and so that existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Thus, potential impacts associated with electrical supply and infrastructure capacity were determined to be less than significant.

Transportation impacts are addressed in Section 5.17, *Transportation*, of the DEIR, which analyzed the Project's potential transportation impacts including generation of vehicle miles traveled (VMT). The DEIR's analysis (pages 5.17-6 through 5.17-8) is based on technical studies and applicable significance thresholds under CEQA. According to the Traffic Study (DEIR, Appendix J), the County VMT threshold is "a net increase of 110 or more daily vehicle trips". The Traffic Study VMT screening analysis determined that the Project would create a net increase of 47 daily vehicle trips. Since the number of daily vehicle trips is less than 110, the Project does not require a detailed VMT analysis. The Project is not expected to have a significant impact on VMT. Impacts were determined to be less than significant. Traffic delay, related to Level of Service (LOS), is no longer a potential impact under CEQA; however, it should be noted that Comment 3-3 received from Caltrans agrees that the Project's low trip generation would not create significant adverse effects on surrounding roadway network operations or intersections. Impacts to parking also are not potential impacts under CEQA.

Regarding decision-making priorities, the CEQA process requires the decision-makers (City Council) to consider environmental impacts disclosed in the EIR when making decisions about the Project. The City Council's decision-making process will include consideration of the environmental analysis contained in the DEIR, public comments received during the review process, and applicable planning policies and regulations. The commenter's concerns about balancing environmental and economic considerations will be part of the public record for the City Council's consideration. It should also be noted that Project site's development parameters are governed by a Settlement Agreement, which establishes specific development rights and entitlements for the Project site. The proposed nine (9) lots are consistent with the Settlement Agreement (DEIR pages 3-5 through 3-8). No further response or action is required under CEQA.

Comment 1-2: The commenter criticizes the City Council for consistently approving development projects despite citizen opposition, arguing that the town's value lies in its rustic and placid character that should be preserved rather than compromised for financial gain.

Response: Under CEQA, the City Council is required to consider the environmental impacts disclosed in the EIR, including impacts to community character as it relates to aesthetics, when making decisions about the Project. The DEIR addresses community character and visual quality in Section 5.1, *Aesthetics*, and finds that the Project would be consistent with applicable zoning and regulations governing scenic quality (page 5.1-7). For consistency with the General Plan and provisions of the Hillside Management Zone, the Project has been designed to minimize grading and development impacts in the northern portion of the Project site, which has steeper hillside terrain, is less-disturbed, and is more heavily vegetated compared to the southern portion of the Project site. Proposed grading and development would be concentrated in the southern portion of the Project site, which is comparatively flatter, developed or highly disturbed, and comprised of unpaved roads, ornamental landscaping, orchards, and four residential buildings with accessory structures. A permanent restrictive easement is also proposed in the highest elevations of the Project site that would prevent any future construction of buildings or vertical structures within a designated "Non-buildable Area."

The Project has been designed to be consistent with the City's General Plan and Municipal Code requirements for hillside development, including provisions to preserve the natural environment and scenic quality of hillside areas. The decision-making process will include consideration of the environmental analysis, public comments received during the CEQA review process, and applicable planning policies that balance development needs with community character preservation. As also previously discussed, the Project site's development parameters are governed by a Settlement Agreement, which establishes specific development rights and entitlements for the Project site. The proposed nine (9) lots are consistent with the Settlement Agreement (DEIR pages 3-5 through 3-8).

The commenter's views regarding development priorities and community character will be part of the public record for the City Council's consideration during their deliberations on the Project. No further response or action is required under CEQA.

COMMENT LETTER NO. 2

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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

August 14, 2025

VIA EMAIL

Clare Lin
Director of Planning & Community Preservation Department
City of Sierra Madre
232 W. Sierra Madre Boulevard
Sierra Madre, CA 91024
EIRComments@sierramadreca.gov

Dear Clare Lin:

Draft Environmental Impact Report for the Ginkgo Stonehouse Residential Project

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability and Draft Environmental Impact Report for the Ginkgo Stonehouse Residential Project. The project proposes to develop nine single-family residential detached lots on approximately nine acres of land in the City of Sierra Madre. Approximately four acres of the nine-acre project site will be proposed as non-buildable. The non-buildable area will be limited to passive open space and maintenance purposes, such as, brush management and fuel modification. The project area is located at the foothills of the San Gabriel Valley, just below the southern boundary of the Angeles National Forest. The City of Sierra Madre is the Lead Agency under the California Environmental Quality Act for the proposed Project.

2-1

Metropolitan owns and operates facilities within and adjacent to the proposed project area. As shown on the attached map, Metropolitan's Upper Feeder, an approximately 116-inch inside-diameter pipeline, is located along East Grand View Avenue, south of the project area. Metropolitan is concerned with potential impacts to the Upper Feeder and rights-of-way that may result from implementation of the proposed Project.

2-2

Metropolitan must be allowed to maintain its rights-of-way and access to its facilities and properties at all times, in order to repair and maintain the current condition of those facilities. In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipes to excessive vehicle, impact or vibratory loads. Any future design plans associated with this Project should be submitted to the attention of Metropolitan's Substructures Team. Approval of the Project should be contingent on Metropolitan's approval of design plans for portions of the proposed Project that could impact its facilities.

2-3

DocuSign Envelope ID: 28F7A738-5913-4BC3-935F-D50C0A15E887

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Clare Lin
Page 2
August 14, 2025

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mwdh2o.com. To assist in preparing plans that are compatible with Metropolitan's facilities and rights-of-way, enclosed is a copy of the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way." Please note that Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's on all designs or plans submitted.

2-4

Metropolitan requests that the City of Sierra Madre avoid any potential impacts that may occur to the Upper Feeder due to implementation of the proposed Project, and propose mitigation measures to offset any potential impacts. It will also be necessary for the City of Sierra Madre to consider Metropolitan's Upper Feeder in its project planning.

2-5

We appreciate the opportunity to provide input to your planning process and look forward to receiving future plans and documentation for this Project. If we can be of further assistance, please contact Jolene Ditmar at jditmar@mwdh2o.com.

2-6

Very truly yours,

DocuSigned by:

A67ED56B82914E6...
Sean Carlson
Team Manager, Environmental Planning

JD:mm
<s:\external reviews\external reviews\comment letters\2025-comment letters>

2-7

Enclosures (2)

Response No. 2

Sean Carlson, Team Manager, Environmental Planning
The Metropolitan Water District of Southern California
August 14, 2025

Comment 2-1: The Metropolitan Water District of Southern California (Metropolitan) reviewed the Draft Environmental Impact Report for the Ginkgo Stonehouse Residential Project, acknowledging the proposal to develop nine single-family residential lots on approximately nine acres in Sierra Madre, with four acres designated as non-buildable area for passive open space and maintenance activities such as brush management and fuel modification, located at the foothills of the San Gabriel Valley below the southern boundary of the Angeles National Forest.

Response: The Metropolitan Water District of Southern California (“Metropolitan” or “Commenter”) acknowledges review of the DEIR and provides a summary of the Project description and location. No further response or action is required under CEQA.

Comment 2-2: Metropolitan owns and operates an approximately 116-inch inside-diameter Upper Feeder pipeline located along East Grand View Avenue, south of the project area, and is concerned about potential impacts to the Upper Feeder and associated rights-of-way that may result from Project implementation.

Response: The commenter identifies that Metropolitan owns and operates an approximately 116-inch inside-diameter Upper Feeder pipeline located along East Grand View Avenue, south of the Project area, and expresses concern about potential impacts to the Upper Feeder and associated rights-of-way that may result from Project implementation. The commenter’s concerns regarding potential impacts to Metropolitan’s infrastructure are noted. The Project would be required to comply with all applicable regulations and coordination requirements with utility providers during construction and operation. Any work that could potentially affect Metropolitan’s facilities would require appropriate coordination, permits, and protective measures as required by Metropolitan and other applicable agencies. The City will ensure that Metropolitan’s concerns are addressed through the appropriate regulatory and coordination processes such as Dig Alert. The proposed development only contemplates adding new City water meter connections, which would not impact or be in close proximity to the Metropolitan water mainline. No further response or action is required under CEQA.

Comment 2-3: Metropolitan requires that its rights-of-way and facility access be maintained at all times for repair and maintenance purposes, and mandates that any design plans for activities in the area of Metropolitan’s pipelines or facilities be submitted to their Substructures Team for review and written approval. Metropolitan prohibits procedures that could subject pipes to excessive vehicle, impact, or vibratory loads, and requests that Project approval be contingent on Metropolitan's approval of design plans for portions that could impact their facilities.

Response: The commenter’s infrastructure protection requirements are noted. The Project would be required to comply with all applicable utility coordination requirements and obtain necessary approvals from affected utility providers prior to construction activities. Standard conditions of approval typically require coordination with utility agencies to ensure protection of existing infrastructure and maintenance of access for utility operations. The City will ensure that appropriate conditions are included in any Project approval to address Metropolitan’s requirements for design plan review, facility protection, and access

maintenance. Any construction activities in proximity to Metropolitan’s facilities would require compliance with Metropolitan’s standards and approval processes to protect the integrity of their infrastructure and maintain operational access. In addition, no offsite design improvements to Grand View Avenue are proposed. No further response or action is required under CEQA.

Comment 2-4: Metropolitan provides detailed pipeline drawings and rights-of-way information through their Substructures Team at EngineeringSubstructures@mwdh2o.com and has enclosed “Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan’s Facilities and Rights-of-Way,” requiring that Metropolitan’s facilities and rights-of-way be fully shown and identified as Metropolitan’s on all submitted designs or plans to ensure compatibility with their infrastructure.

Response: The commenter’s guidance regarding design plan requirements and coordination procedures is noted. The Project Applicant would be required to obtain and incorporate Metropolitan’s pipeline drawings and rights-of-way information into Project design plans as specified by Metropolitan’s guidelines. Standard conditions of approval would require compliance with Metropolitan’s “Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan’s Facilities and Rights-of-Way” and proper identification of Metropolitan’s facilities on all construction documents. However, no improvements near the Metropolitan water line are proposed. No further response or action is required under CEQA.

Comment 2-5: Metropolitan requests that the City of Sierra Madre avoid potential impacts to the Upper Feeder from Project implementation, propose mitigation measures to offset any potential impacts, and consider Metropolitan’s Upper Feeder in project planning processes.

Response: The commenter’s request for impact avoidance, mitigation measures, and inclusion in project planning processes is noted. The DEIR addresses utilities and service systems in Section 5.19.5, *Environmental Impact Analysis* (pages 5.19-16 to 5.19-21), which analyzes potential impacts to existing utility infrastructure and concludes that impacts would be less than significant. The analysis notes that “utility improvements and connections would be completed within the Project site and adjacent streets” (page 5.19-16) and that construction connections would involve “minor trenching” with “short-term” impacts and implementation of construction best management practices.

The Project would be required to comply with standard conditions of approval that typically include coordination with affected utility providers to avoid or minimize impacts to existing facilities. Standard regulatory processes, including contacting Dig Alert, require coordination with utility agencies to protect existing infrastructure and maintain system integrity, and the Project would be subject to these requirements. No further response or action is required under CEQA.

Comment 2-6: Metropolitan appreciates the opportunity to provide input on the planning process and looks forward to receiving future plans and documentation for the Project, with further assistance available through contact with Jolene Ditmar at jditmar@mwdh2o.com.

Response: The Metropolitan Water District of Southern California appreciates the opportunity to provide input on the planning process and looks forward to receiving future plans and documentation for the Project. The commenter’s contact information for future coordination is noted. No further response or action is required under CEQA.

Comment 2-7: Metropolitan’s comment letter included two enclosures: a Location Map of Metropolitan’s Upper Feeder near the Project’s limits and the “Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan’s Facilities and Rights-of-Way” (July 2018) prepared by The Metropolitan Water District of Southern California.

Response: The commenter provided two enclosures with their comment letter: a Location Map of Metropolitan’s Upper Feeder near the Project’s limits and the “Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan’s Facilities and Rights-of-Way” (July 2018). The commenter’s provision of supporting documentation and technical guidance materials is acknowledged and will be made available to the Project Applicant for reference during design and construction planning phases. No further response or action is required under CEQA.

COMMENT LETTER NO. 3

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life*

August 20, 2025

Clare Lin, Director
Planning & Community Preservation Department
City of Sierra Madre
232 West Sierra Madre Blvd.
Sierra Madre, CA 91024

RE: Ginkgo Stonehouse Residential Project
(TTM No. 65348)
SCH # 2023100084
Vic. LA-210/PM R31.91
GTS # LA-2023-04854-DEIR

Dear Clare Lin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project proposes to demolish the 4 existing single-family detached units and to develop nine 9 single-family residential detached lots on approximately nine 9 acres of land.

3-1

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. As a reminder, all environmental document should include Vehicle Miles Traveled. You may reference the Governor's Office of Planning and Research (OPR) for more information:

3-2

<https://opr.ca.gov/ceqa/#guidelines-updates>

Based on Caltrans' review of the trip generation estimates, a transportation impact analysis is only required when a project is expected to generate more than 110 daily vehicle trips. The proposed project is estimated to generate approximately 47 net daily trips, which is well below this threshold. Therefore,

3-3

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

Clare Lin, Director
August 20, 2025
Page 2 of 2

Caltrans concurs that a transportation impact analysis is not warranted. Given the low trip generation, the project is not anticipated to create any significant adverse effects on the operations of the surrounding roadway network or intersections, and no further vehicle miles traveled (VMT) analysis is necessary.

3-3

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover. Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water.

3-4

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2023-04854-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse

3-5

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

Response No. 3

Miya Edmonson, LDR/CEQA Branch Chief
California Department of Transportation (Caltrans) District 7
August 20, 2025

Comment 3-1: The California Department of Transportation (Caltrans) acknowledged their inclusion in the environmental review process for the Project, which proposes to demolish four existing single-family detached units and develop nine single-family residential detached lots on approximately nine acres of land.

Response: The California Department of Transportation (“Caltrans” or “Commenter”) acknowledges their inclusion in the environmental review process and provides a summary of the Project description. No further response or action is required under CEQA.

Comment 3-2: Caltrans notes its mission to provide a safe and reliable transportation network while respecting the environment, and reminds the City that Senate Bill 743 (2013) codified into CEQA law the requirement to use Vehicle Miles Traveled (VMT) as the primary metric for identifying transportation impacts in development projects, with all environmental documents required to include VMT analysis and reference to the Governor’s Office of Planning and Research (OPR) for additional guidance at <https://opr.ca.gov/ceqa/#guidelines-updates>.

Response: The commenter’s reminder regarding VMT analysis requirements is noted. The DEIR addresses transportation impacts in Section 5.17, *Transportation*, which includes analysis of VMT consistent with SB 743 requirements. The Project’s transportation analysis was conducted in accordance with current CEQA Guidelines and applicable VMT thresholds. The commenter’s reference to the Governor’s Office of Planning and Research guidance is acknowledged as a resource for VMT analysis methodology. No further response or action is required under CEQA.

Comment 3-3: Caltrans reviewed the trip generation estimates and confirmed that a transportation impact analysis is only required when a project generates more than 110 daily vehicle trips, noting that the proposed Project is estimated to generate approximately 47 net daily trips, which is well below this threshold. Caltrans concurs that a transportation impact analysis is not warranted and that given the low trip generation, the Project is not anticipated to create significant adverse effects on surrounding roadway network operations or intersections, with no further Vehicle Miles Traveled (VMT) analysis necessary.

Response: The commenter’s concurrence with the DEIR’s transportation analysis is noted. As stated in Section 5.17.5, *Environmental Impact Analysis*, under Impact TRA-2 (pages 5.17-7 to 5.17-8), the Project would generate 47 net daily vehicle trips, which is below the County VMT threshold of 110 daily vehicle trips. The DEIR concludes that “since the number of daily vehicle trips is less than 110, the Project does not require a detailed VMT analysis” and that “the Project is not expected to have a significant impact on VMT.”

Caltrans’ confirmation that the Project’s low trip generation would not create significant adverse effects on surrounding roadway network operations or intersections supports the DEIR’s conclusion that transportation impacts would be less than significant. The commenter’s concurrence with the VMT screening analysis and determination that no further analysis is necessary is acknowledged. No further response or action is required under CEQA.

Comment 3-4: Caltrans notes that any transportation of heavy construction equipment and/or materials requiring oversized transport vehicles on State highways will need a Caltrans transportation permit, recommends that large-size truck trips be limited to off-peak commute periods during both construction and operation phases, requires construction truck loads to be covered with tarpaulin, and reminds the Project that storm water run-off is a sensitive issue for Los Angeles County with projects needing to be designed to discharge clean run-off water.

Response: The commenter's recommendations regarding construction practices and permit requirements are noted. The Project would be required to comply with all applicable state and local regulations regarding construction activities, including obtaining necessary Caltrans transportation permits for any oversized vehicles using State highways. Standard construction practices typically include requirements for covering truck loads and scheduling construction activities to minimize traffic impacts during peak hours.

Regarding stormwater, DEIR Section 5.10, *Hydrology and Water Quality*, addresses water quality impacts in Section 5.10.5, *Environmental Impact Analysis*, under Impact HWQ-1 (pages 5.10-15 to 5.10-17), which analyzes stormwater management requirements and concludes that impacts would be less than significant with compliance with applicable regulations. As stated in the analysis, the Project would be required to obtain National Pollutant Discharge Elimination System (NPDES) State General Construction Permit coverage and implement a Stormwater Pollution Prevention Plan (SWPPP) with Best Management Practices. For long-term operations, the Project would comply with Municipal Stormwater Permit requirements and the City's Municipal Code Title 7 (Stormwater Pollutant Elimination) and implement biofiltration systems at each lot to treat runoff before discharge.

The commenter's recommendations for construction management practices would be incorporated into standard conditions of approval to ensure compliance with applicable regulations and minimize construction-related impacts on the transportation network and water quality. No further response or action is required under CEQA.

Comment 3-5: Caltrans provides contact information for future coordination, noting that questions should be directed to Mr. Alan Lin, the project coordinator, at (213) 269-1124 with reference to GTS # LA-2023-04854-DEIR.

Response: Caltrans provides contact information for future coordination, noting that questions should be directed to Mr. Alan Lin, the project coordinator, at (213) 269-1124 with reference to GTS # LA-2023-04854-DEIR. The commenter's contact information for future coordination is noted. No further response or action is required under CEQA.

COMMENT LETTER NO. 4

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



August 25, 2025

Clare Lin
City of Sierra Madre
232 West Sierra Madre Boulevard
Sierra Madre, CA 91024
EIRComments@sierramadreca.gov

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GINKGO STONEHOUSE RESIDENTIAL PROJECT, SCH NO. 2023100084, LOS ANGELES COUNTY, CA

Dear Clare Lin:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the city of Sierra Madre (City; Lead Agency) for the Ginkgo Stonehouse Residential Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

4-1

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

4-2

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

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Clare Lin
City of Sierra Madre
August 25, 2025
Page 2 of 25

regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

4-2

PROJECT DESCRIPTION SUMMARY

Proponent: Ginkgo Stonehouse, LLC

Objective: The Project proposes the development of nine single-family residential detached lots. Approximately four of the nine acres within the Project site are proposed as a non-buildable area that would prohibit the construction of vertical structures but would allow for landscaping and passive open space. The site currently has four existing residential structures and accessory infrastructure that would be demolished prior to grading activities. Following grading activities, residential building pads with associated infrastructure would be constructed. Additionally, a new private street with a cul-de-sac, driveway/fire access road, retaining walls, swales, and utility connections to East Grand View Avenue would be installed. Three custom homes would be built on separate residential building pads and would include a driveway, walkways, drainage system, stormwater biofiltration system, and connections for all utilities. A new Homeowner's Association would maintain the private street, the development's associated infrastructure, and each individual lot biofiltration system.

4-3

Alternatives: The City provides two alternatives in the DEIR in addition to the proposed Project. Alternative 1: No Project, Current General Plan and Zoning would result in no new development on the Project site in the immediate future. The site would remain in its current condition for an unknown period of time and would retain the four existing single-family residential buildings, three sheds, and two gazebos. Under Alternative 2: Reduced Lot Size Design Alternative, the Project site would construct nine residential detached lots as proposed in the Project; however, Lots 1 through 4 would be reduced in size and condensed toward the south end of the site and situated close to East Grand View Avenue. In this alternative, the grading footprint would be reduced, no additional driveway and fire access road would be constructed, and the fuel modification and brush management requirements may be reduced within the non-buildable area for individual lot owners.

Location: The Project site is approximately 9 acres located at 935 East Grand View Avenue in the City, Los Angeles County. The site is bound by the San Gabriel Mountains to the north, Liliano Drive and Stonehouse Road to the east, East Grand

² "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 3 of 25

View Avenue to the south, and Acacia Street to the west. The Assessor's Parcel Numbers associated with the Project site is 5764-001-017 and 5764-001-018.

4-3

Biological Setting: The Project site is located at the base of the San Gabriel Mountains within the northern region of Los Angeles County. The topography of the Project site is a mix of flat land and hillside, bordered by residential development to the east, west, and south. A Biological Technical Report (BTR) was provided for the Project, which compiled findings from a general survey, bat focused surveys, an arborist report, 2024 breeding season surveys for coastal California gnatcatcher (*Poliioptila californica californica*; Endangered Species Act (ESA)-listed threatened and California Species of Special Concern (SSC)), and 2024 focused surveys for Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered). No Crotch's bumble bee or coastal California gnatcatcher were identified during their respective surveys. During the bat surveys, the yuma myotis (*Myotis yumanensis*), California myotis (*Myotis californicus*), canyon bat (*Parastrellus hesperus*), big brown bat (*Eptesicus fuscus*), and Mexican free-tailed bat (*Tadarida brasiliensis*) were identified.

A total of 71 plant species were observed within the Project site during the general biological survey and rare plant survey. The vegetation on site encompasses 0.09 acre of arroyo willow (*Salix lasiolepis*) thickets, 2.39 acres of coastal sage scrub (*Artemisia californica*), 1.62 acres of eucalyptus (*Eucalyptus* spp.) grove, and 0.66 acre of mixed coast live oak (*Quercus agrifolia*) woodland. Additionally, no streams or water features were identified throughout the Project site.

4-4

A total of 27 wildlife species or signs were observed during field surveys. Species that are of potential concern for the Project include, but are not limited to, mountain lion (*Puma concolor*; CESA candidate endangered), Crotch's bumble bee, coastal California gnatcatcher, western mastiff bat (*Eumops perotis*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), western red bat (*Lasiurus frantzii*; SSC), and raptors and migratory birds. The DEIR incorporates four mitigation measures that outline a general preconstruction survey, tree replacement plan, nesting bird and raptor survey, and a preconstruction roosting bat survey.

Project Timeline: Project construction is anticipated to consist of demolition, site preparation, grading, building construction, paving, and architectural coating over the span of three years.

4-5

Project History: CDFW previously reviewed the Notice of Preparation (NOP) and provided a comment letter to the City on November 8, 2023. Comments in the NOP addressed mountain lion, western mastiff bat, rare plants, southern California legless lizard, and nesting and raptors.

4-6

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially

4-7

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 4 of 25

significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

COMMENT # 1: Alternative 2: Reduced Lot Size Design Alternative

Issue: CDFW supports Alternative 2: Reduced Lot Size Design Alternative, as the Project's current design would result in greater adverse impacts on the flora and fauna within the non-buildable area of the Project site.

Specific impact: The Project's current design will have a larger grading footprint and encroachment upon the natural habitat (i.e., coastal sage scrub) in the northern portion of the Project site. By implementing Alternative 2, the reduced development footprint would consequently decrease the loss of foraging and nesting habitat for special-status species.

Why impact would occur: The Project site supports at least five vegetation communities and is connected to the San Gabriel Mountains. A total of 98 flora and fauna were observed during general biological field surveys within the Project site. Focused surveys identified five different bat species and three different bee species. Based on these findings alone, it is reasonable to conclude that the Project site provides biological value to a wide variety of wildlife in the area. Under Alternative 2, the same number of residential units would be proposed as the current Project design, but the layout would be closer to East Grand View Avenue where development currently exist. This design would allow for less encroachment into the non-buildable area due to the removal of the additional driveway and fire access road, smaller grading footprint, and less fuel modification activities within the non-buildable area. Additionally, moving development away from the hillside and leaving as much coastal sage scrub untouched would allow for more suitable habitat for species such as coastal California gnatcatcher and Crotch's bumble bee. With more available habitat, nesting and foraging opportunities for wildlife would remain consistent with current site conditions.

4-7

Evidence impact would be significant: Section 15126.6(e)(2) of the State CEQA Guidelines requires that an EIR identify an environmentally superior alternative among the alternatives evaluated. The Alternative 2 is an environmentally superior alternative, compared to the proposed Project, that would reduce the impacts to natural habitat that supports CESA- and ESA-listed species.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation # 1: Adoption of Alternative 2 - CDFW strongly recommends the City and Project proponent moves forward with the adoption of Alternative 2: Reduced Lot Size Design Alternative for the Project.

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 5 of 25

COMMENT # 2: Fuel Modification Zone

Issue: CDFW is concerned that the DEIR does not adequately address, analyze, and mitigate fuel modification activities in relation to biological resources within the Project site.

Specific impact: The DEIR does not clearly provide compensatory mitigation to offset the loss of habitat within the fuel modification zone. Impacts to native vegetation communities to create defensible space should be treated as permanent impacts to biological resources and mitigated as such.

Why impact would occur: The DEIR states that “[M]aintenance within the non-buildable areas, such as brush management/fuel modification, would be the responsibility of the individual lot owner” (pg. 1-3). The DEIR classified fuel modification as part of maintenance but does not discuss what the fuel modification zones would be for each residential lot and what specific activities would be associated within the fuel modification zones. Additionally, the DEIR does not provide an impact analysis on what vegetative communities would be impacted by fuel modification activities. Moreover, no impact analysis was provided on how fuel modification activities would impact wildlife such as avian species. It is important to note that fuel modification activities constitute as ongoing impacts that will perpetually impact the plant communities and the species that depend on these natural communities. Indirect effects (e.g., noise) from fuel modification activities may also have an impact on wildlife that utilize the open space that abuts the Project site. Given that fuel modification activities will result in ongoing direct and indirect impacts to natural resources within the Project site and surrounding open space, compensatory mitigation should be provided.

4-8

Evidence impact would be significant: Certain species are in danger of extinction because their habitats have been severely reduced in acreage, are threatened with destruction or adverse modification, or because of a combination of these and other factors. The CESA and NPPA provide additional protection for such species, including take prohibitions (Fish & G. Code, § 2050 et seq.; Fish & G. Code, § 1908). Inadequate avoidance, minimization, and mitigation measures for impacts to these CEQA locally sensitive vegetation communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation # 2: Fuel Modification Impacts – The City should revise the DEIR to include a Fire Management Plan for public review. With respect to defensible space,

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 6 of 25

the Fire Management Plan should fully describe and identify the location, acreage, and composition of defensible space within the Project site. The City through its planning processes, should ensure that defensible space is provided and accounted for within proposed development areas, and not included in any conservation areas. Additionally, the Fire Management Plan should outline compensatory mitigation to offset the permanent loss of natural vegetation.

4-8

Mitigation Measure #1: Fuel Modification Compensatory Mitigation - The Project proponent shall provide compensatory mitigation for natural vegetation impacted within the fueling modification zone. At a minimum, the Project proponent shall demonstrate at least a 2:1 in-kind replacement ratio in the undisturbed areas of the Project site that is outside of the development footprint and fuel modification zone.

COMMENT # 3: Impacts on Mountain Lion

Issue: The Project may impact mountain lion through habitat loss and an increase of human interaction. The DEIR does not provide avoidance, or minimization measures specific to mountain lion.

Specific impact: Project implementation may directly impact mountain lion habitat through vegetation removal, grading, general construction activities, and expose lions to increased human presence within the residential development. Indirect impacts include increased levels of noise, vibration, sound, and lighting.

Why impact would occur: The northern portion of the Project site allows for wildlife to enter the site from the San Gabriel Mountains. According to the BTR, there is a high potential for mountain lion presence based on observed evidence that the northern portion of the site is used as a foraging site (scat, foraged plants, trails to food sources) for larger mammals) for multiple mammal species including mule deer, coyotes and black bears (pg. 23). During surveys, mule deer (*Odocoileus hemionus*) were directly observed within the Project site. Mule deer provide the primary source of food for mountain lions in southern California, making up a significant proportion of their diet (CDFW 2025a). With the residential development footprint abutting the San Gabriel Mountains, it is likely that mule deer will take advantage of the residence as refugia to avoid or limit their potential interactions with predators. Although mountain lions seek to limit interactions with humans, they likely will not be completely deterred from activity within the development. It is entirely possible that lions may continue to frequent the area in seeking prey. Furthermore, it is noted in the DEIR that mountain lion sightings have been made in the surrounding neighborhoods (pg. 5.4-8). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result of the incursion of humans into historically wildland areas, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020) and areas of high human activity have lower occupancy of rare carnivores.

4-9

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 7 of 25

Evidence impact may be significant: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern and central coastal California as threatened under CESA (CBD 2019). As a CESA candidate species, the mountain lion in southern California is granted the full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). As to CEQA, the status of mountain lion as a threatened species under CESA qualifies it as an endangered, rare, or threatened species under CEQA (CEQA Guidelines, §15380). No mitigation has been proposed for impacts on mountain lion from the Project from the standpoint of habitat loss and encroachment, as well as anthropogenic impacts discussed above.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation #3: Wildlife Fencing – The City and Project proponent should consider placing a wildlife exclusion fence around the perimeter of the residential community to exclude mule deer and other potential prey for mountain lion from entering the residences. Wildlife fencing should be at least 12-feet tall with an overhang discouraging jumping. Fences should be made from sturdy material with gaps no larger than 4-inches.

4-9

Recommendation #4: Human-Wildlife Interaction - To prevent human-wildlife conflicts within the Project site, the Project proponent should incorporate the following elements into the design of the residential development, as well as management and maintenance of the residences in perpetuity. These elements should be recorded in any HOA documents:

1. Never feed deer or other wildlife; it is illegal to feed deer and other big game in California and it will attract mountain lions (Cal. Code Regs., tit. 14 § 251.3);
2. Deer-resistant/deterring landscape design, planting species that are less palatable to mule deer;
3. Trim bushes and shrubs to 2 to 3-feet above the ground to reduce hiding places for mountain lions and keep brush trimmed low; and,
4. Install motion-sensitive lighting and consider installing additional deterrents around the residential development

Mitigation Measure #2: Mountain Lion Encounters – If a mountain lion is encountered during pre-construction surveys or construction activities, the qualified biologist and all other worker personnel shall immediately leave the work area. The qualified biologist shall immediately contact CDFW, and the animal shall be allowed to passively move out of harm's way to an area that is unaffected by the Project. Project

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 8 of 25

activities the Project site shall not recommence in the work area until the following day and only with coordination and communication with CDFW prior to recommencing project activities.

Mitigation Measure #3: Incidental Take Permit - If take or adverse impacts to mountain lion cannot be avoided, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq.). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.

4-9

Mitigation Measure #4: Rodenticides – To eliminate potential mortality, the Project proponent shall prohibit use of any and all rodenticides within the Project site in perpetuity. The Project proponent shall inform future homeowners that no rodenticides shall be used on site at any time as a condition of home build or purchase.

COMMENT # 4: Impacts to Crotch's Bumble Bee

Issue: The Project may impact suitable nesting and foraging habitat for Crotch's bumble bee. The DEIR does not include measures to ensure impacts to the species are appropriately mitigated.

Specific impact: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat of Crotch's bumble bee. Project ground disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impact would occur: The Project site contains vegetation such as coastal sage scrub that provides nesting and foraging opportunities for Crotch's bumble bee. According to BTR, three other *Bombus* bee species were identified during the 2024 habitat assessment and focused surveys for Crotch's bumble bee. Additionally, the site provides highly suitable ecological conditions for Crotch's bumble bee habitat with nectar and pollen from scrub species (pg. 17). The City acknowledges the high potential for Crotch's bumble bee to be present but does not incorporate any species-specific measures in the DEIR since the species was not identified during the 2024 focused surveys. While a general pre-construction survey is outlined in Mitigation Measure BIO-1, the level of detail and biological expertise in accurately identifying a Crotch's bumble bee warrants protocol-level surveys by a CDFW-approved biologist. Additionally, bumble bees are known to move their nests sites each year; therefore, focused surveys for this CESA candidate species should be conducted each year that Project activities would occur (CDFW 2023). Although findings from 2024 focused surveys failed to detect Crotch's bumble bee one year, the City or Project proponent cannot guarantee that the Project won't impact Crotch's bumble bee in subsequent years during construction activities without adequate surveys to confirm presence or absence. Without subsequent focused surveys, the Project's ground and vegetation disturbance

4-10

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 9 of 25

could result in incidental take of a CESA candidate species and significant impacts to the species such as changes in foraging behavior, burrow collapse, reduced health and vigor of eggs, young, and/or queens, and direct mortality.

Furthermore, surveys to determine presence or absence of CESA-listed or candidate species pose the risk of incidental take of the respective species. Given that incidental take may occur, surveyors must be qualified to conduct surveys for Crotch's bumble bee. Project proponents applying for a permit should submit a resume of the proposed surveyor (designated biologist) with their research MOU or ITP application for review by CDFW. Given the level of expertise needed for taxonomic identification, it may be acceptable for a less experienced surveyor to confirm the identifications of the bumble bees encountered during surveys by sending photo vouchers to an experienced taxonomist. If this is the case, please also provide the resume of the taxonomist in addition to the qualified biologist (CDFW 2023). CDFW would appreciate future coordination prior to focused surveys to review and approve survey methodology and surveyors.

Evidence impact would be significant: The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Crotch's bumble bee. The Project may also reduce the population size and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project site. In addition, Crotch's bumble bee has a State Ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#)³. Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the District (CEQA Guidelines, § 1565).

4-10

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure # 5: Crotch's Bumble Bee Surveys - The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's [Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species](#)⁴. Focused surveys shall also

³ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>

⁴ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 10 of 25

be conducted throughout the entire Project site during the appropriate flying season (April through August) to ensure no missed detection of Crotch's bumble bee occurs. Prior to focused surveys, surveyors shall reach out to CDFW to discuss methodologies and surveyor qualifications. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project ground-disturbing activities.

Mitigation Measure # 6: Crotch's Bumble Bee Incidental Take Permit – If Crotch's bumble bee is detected, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with all conditions detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal.

4-10

Recommendation # 5: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the Lead Agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

COMMENT # 5: Impacts on Coastal California Gnatcatcher

Issue: The Project may impact coastal California gnatcatcher.

Specific impact: Project activities such as grading and vegetation removal may result in permanent loss of nesting and foraging habitat. Ground-disturbing activities during breeding and nesting season may also result in nest abandonment, reproductive suppression, or incidental loss of fertile eggs or nestlings.

4-11

Why impact would occur: The DEIR acknowledges that coastal California gnatcatcher is an obligatory resident of coastal sage scrub, which is present within the Project site. While the City notes that there is potential for this SSC to be present on site, no species-specific measures are incorporated in the DEIR since the species was not observed during the 2024 focused surveys. Subsequent focused surveys should be conducted to accurately determine presence/absence of coastal California gnatcatcher. Project activities without the appropriate surveys could result in injury or mortality of unidentified gnatcatcher, including eggs or nestlings. Furthermore, grading activities and removal of coastal sage scrub can result in permanent loss of breeding and foraging habitat for coastal California gnatcatcher.

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 11 of 25

Evidence impact would be significant: CEQA provides protection for special status species, including SSC. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065). The reductions in the number of special status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and/or USFWS.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation # 6: USFWS Consultation - Take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. CDFW recommends consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground disturbing activities and/or vegetation removal that may impact gnatcatcher.

Mitigation Measure # 7: Coastal California Gnatcatcher Surveys – The Project proponent shall retain a qualified biologist with an appropriate USWFS permit to survey the Project site. The qualified biologist shall conduct surveys according to USFWS’s [Coastal California Gnatcatcher \(*Polioptila californica californica*\) Presence/Absence Survey Protocol](#)⁵. The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing. CDFW recommends gnatcatcher surveys be conducted and USFWS notified (per protocol guidance) prior to the City’s issuance of a grading permit.

COMMENT # 6: Impacts on Bat Species and Roosts

Issue: Mitigation Measure BIO-4 does not adequately mitigate the Project impacts on bat species and potential bat maternity roosts.

Specific impact: The Project would result in the removal of trees, tree encroachment, and vegetation removal within the disturbance footprint. These activities could result in direct mortality of individual bats or roost disturbance via increased noise disturbances,

⁵ <https://www.fws.gov/sites/default/files/documents/survey-protocol-for-coastal-california-gnatcatcher.pdf>

4-11

4-12

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 12 of 25

human activity, dust, ground-disturbing activities (e.g., staging, access, grading, excavating, paving), and vibrations caused by heavy equipment.

Why impact would occur: According to the BTR, daytime habitat assessment and nighttime emergence acoustic surveys were conducted on the Project site for bat presence. Findings from the surveys detected five species of bats with most calls coming from two species indicating the potential presence of a roosting site and/or maternity colony within the Project site (pg. 19). Additionally, there is a moderate to high potential for the Townsend's big-eared bat, western mastiff bat, and western red bat to be present within the Project site. While CDFW appreciates the discussion in the DEIR on the Project's impact on bat species and the incorporation of pre-construction surveys, the mitigation measure does not discuss outline compensatory mitigation to offset the loss of bat roosting habitat. Without replacement of bat roosting habitat, the Project would contribute to the cumulative loss of suitable bat habitat on a local and regional scale. At a minimum the City and Project proponent should consider providing artificial roosting structures to replace natural roosting habitat on site.

Evidence impact would be significant: Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Additionally, a California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

1. if the species is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
2. if the species is listed as threatened or endangered under ESA-, but not CESA-, threatened, or endangered;
3. if the species meets the State definition of threatened or endangered but has not formally been listed;
4. if the species is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and,
5. if naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA- threatened or - endangered status (CDFW 2025).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

4-12

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 13 of 25

Mitigation Measure # 8: Mitigation Measure BIO-4 – CDFW recommends the City revise Mitigation Measure BIO-4 to incorporate the underlined language and remove the language in strikethrough:

Prior to vegetation removal occurring between April 1 and August 31, the Project proponent shall retain a qualified bat specialist to conduct daytime and nighttime bat surveys throughout the Project site (plus a 100-foot buffer as access allows) ~~a pre-construction bat roost survey shall be conducted~~ to check for signs of active bat use, including guano, urine staining, and bat vocalizations (detected using ultrasonic acoustic equipment). A discussion of survey results, including negative findings, shall be provided to the City and CDFW. ~~If individual bats or active maternity roosts are identified, the Project proponent and qualified bat specialist project shall consult with and receive written concurrence from California Department of Fish and Wildlife (CDFW) to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat maternity colonies based on CDFW recommendations. No project activities shall occur within the established buffer area until a qualified biologist verifies the maternity bat roost is no longer in use.~~

If construction activities begin outside the bat maternity season (September 1 through March 31), a qualified bat specialist ~~biologist~~ shall conduct a pre-construction survey no more than 14 days prior to vegetation removal to determine if bats are roosting in the project area. If roosting bats are detected, consultation with CDFW shall occur prior to vegetation removal to determine appropriate exclusion methods and timing restrictions. Any identified roost sites shall be monitored by a qualified bat specialist ~~biologist~~ to ensure bats have vacated the roost prior to the start of construction activities. If no roosting bats are detected during the pre-construction survey, vegetation removal may proceed without restriction.

4-12

Mitigation Measure # 9: Tree Removal – To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If bats are not detected, but the bat specialist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roost shall not be bucked or mulched immediately. A period of at least 24-48 hours, as determined by the bat specialist, shall elapse prior to such operations to allow bats to escape.

Mitigation Measure #10: Bat Roost Compensatory Mitigation – If the Project impacts confirmed bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified bat

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 14 of 25

specialist. The qualified bat specialist shall prepare a management plan for the bat roost structures for CDFW to review and approve. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.

4-12

ADDITIONAL COMMENTS

Mitigation Measure BIO-1. CDFW recommends the City revise Mitigation Measure BIO-1 to incorporate the underlined language and omit the language in strikethrough:

The following measures shall be implemented prior to and during construction as follows:

- a) Within 3 days prior to the start of vegetation removal and/or ground disturbing activities (i.e., grading/excavations), a preconstruction biological resources clearance survey shall be conducted by the Project Biologist. The Biologist shall look for special status plant and animal species ~~within at least a moderate or higher potential to colonize~~ the Project site. If a special status species is identified, it shall be avoided using temporary no-work buffers until the individual leaves on its own or is relocated pursuant to applicable regulations. Buffers shall be demarcated by the qualified biologist in coordination with CDFW and/or USFWS. CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as applicable to the identified species, and any permits needed for take of the species shall be obtained. Results of the survey shall be provided to the City.
- b) Prior to vegetation removal and/or ground disturbing activities (i.e., grading/excavations), the Biologist shall clearly delineate the limits of disturbance to avoid unplanned impacts within the non-buildable area.
- c) The Project Biologist shall conduct a worker education program at a pre-construction meeting that includes identification, avoidance and reporting procedures regarding nesting birds, bat maternity colonies, and special status plants and animals with a moderate or higher chance to occur on the Project site.
- d) If any special-status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

4-13

Lighting. Artificial night lighting can affect plants and wildlife through attraction and disorientation, loss of connectivity, interference with pollination and foraging, and disruption of circadian rhythms and lunar and seasonal cycles (Barrientos et al. 2023).

4-14

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 15 of 25

CDFW recommends the City incorporate a lighting plan in the final EIR that discusses the criteria used in selecting the types of light fixtures, a schedule detailing the hours various lights will be on, and steps taken to minimize adverse effects on wildlife species. Methods for minimizing adverse effects of artificial night lighting include lighting only where light is necessary, turning lights off when they are not in use (e.g., motion detector), only using as much light as is needed, directing the light only where it is needed, and using the lowest possible correlated color temperature for the goal of the lighting.

4-14

Landscaping. CDFW recommends the City incorporate a planting palette in the final EIR, specifying the vegetation that will be used as landscaping for this Project. The Project proponent should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species, particularly 'moderate' or 'high' listed by the [California Invasive Plant Council](#)⁶. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

4-15

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include the mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

4-16

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](#)⁷ provides directions regarding the types of information that should be reported and allows on-line submittal of field survey forms.

4-17

⁶ <https://www.cal-ipc.org/plants/inventory/>

⁷ <https://wildlife.ca.gov/Data/CNDDDB>

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 16 of 25

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)⁸.

4-17

The City should ensure data collected for the preparation of the DEIR is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

4-18

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Julisa Portugal⁹, Senior Environmental Scientist (Specialist).

4-19

Sincerely,

DocuSigned by:



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Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

⁸ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

⁹ Phone: (858) 203-5872; Email: Julisa.portugal@wildlife.ca.gov

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 17 of 25

ec: California Department of Fish and Wildlife
Victoria Tang, CDFW Environmental Program Manager
Steve Gibson, Senior Environmental Scientist Supervisor
Julisa Portugal, Senior Environmental Scientist (Specialist)

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

4-19

REFERENCES

Barrientos, R., Vickers, W., Longcore, T., Abelson, E. S., Dellinger, J., Waetjen, D. P., & Shilling, F. M. 2023. Nearby night lighting, rather than sky glow, is associated with habitat selection by a top predator in human-dominated landscapes. *Philosophical Transactions of the Royal Society B*, 378 (1892), 20220370.

[CBD] Center of Biological Diversity. 2019. A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA). Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=171208&inline>

[CDFW] California Department of Fish and Wildlife. 2013. Human/Wildlife Interactions in California: Mountain Lion Depredation, Public Safety, and Animal Welfare. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68271>

4-20

[CDFW] California Department of Fish and Wildlife. 2023. Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

[CDFW] California Department of Fish and Wildlife. 2025a. Mountain Lions in California. Available at: <https://wildlife.ca.gov/Conservation/Mammals/Mountain-Lion#632775308-mountain-lion--wolf--prey-spatiotemporal-interactions>

[CDFW] California Department of Fish and Wildlife. 2025b. Threatened and Endangered Species. Available at: <https://wildlife.ca.gov/Conservation/CESA>

Lucas, E. (2020). Recreation-related disturbance to wildlife in California – better planning for and management of recreation are vital to conserve wildlife in protected areas where recreation occurs. *California Fish and Wildlife, Recreation Special Issue* 2020: 29-51.

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 18 of 25

ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #1: Fuel Modification Compensatory Mitigation The Project proponent shall provide compensatory mitigation for natural vegetation impacted within the fueling modification zone. At a minimum, the Project proponent shall demonstrate at least a 2:1 in-kind replacement ratio in the undisturbed areas of the Project site that is outside of the development footprint and fuel modification zone.</p>	Following Project activities	Project Proponent
<p>Mitigation Measure #2: Mountain Lion Encounters If a mountain lion is encountered during pre-construction surveys or construction activities, the qualified biologist and all other worker personnel shall immediately leave the work area. The qualified biologist shall immediately contact CDFW, and the animal shall be allowed to passively move out of harm's way to an area that is unaffected by the Project. Project activities the Project site shall not recommence in the work area until the following day and only with coordination and communication with CDFW prior to recommencing project activities.</p>	During Project activities	Qualified Biologist/ Worker Personnel
<p>Mitigation Measure #3: Incidental Take Permit If take or adverse impacts to mountain lion cannot be avoided, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW. The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.</p>	Prior to ground-disturbing activities	Project Proponent
<p>Mitigation Measure #4: Rodenticides To eliminate potential mortality, the Project proponent shall prohibit use of any and all rodenticides within the Project site in perpetuity. The Project proponent shall inform</p>	Prior to, during and following	Project Proponent

4-21

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 19 of 25

Mitigation Measure	Timing	Responsible Party
future homeowners that no rodenticides shall be used on site at any time as a condition of home build or purchase.	Project activities	
<p>Mitigation Measure #5: Crotch's Bumble Bee Surveys The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Focused surveys shall also be conducted throughout the entire Project site during the appropriate flying season (April through August) to ensure no missed detection of Crotch's bumble bee occurs. Prior to focused surveys, surveyors shall reach out to CDFW to discuss methodologies and surveyor qualifications. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project ground-disturbing activities.</p>	Prior to ground-disturbing activities	Project Proponent/ Qualified Biologist
<p>Mitigation Measure #6: Crotch's Bumble Bee Incidental Take Permit If Crotch's bumble bee is detected, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW. The Project proponent shall comply with all conditions detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal.</p>	Prior to ground-disturbing activities	Project Proponent
<p>Mitigation Measure #7: Coastal California Gnatcatcher Surveys The Project proponent shall retain a qualified biologist with an appropriate USFWS permit to survey the Project site. The qualified biologist shall conduct surveys according to USFWS's Coastal California Gnatcatcher (<i>Polioptila californica californica</i>) Presence/Absence Survey Protocol. The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing. CDFW recommends gnatcatcher surveys be conducted and</p>	Prior to issuance of grading permit	Project Proponent/ Qualified Biologist

4-21

Docusign Envelope ID: 7B713D80-5D70-431E-5237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 20 of 25

Mitigation Measure	Timing	Responsible Party
USFWS notified (per protocol guidance) prior to the City's issuance of a grading permit.		
<p>Mitigation Measure #8: Mitigation Measure BIO-4 Prior to vegetation removal occurring between April 1 and August 31, the Project proponent shall retain a qualified bat specialist to conduct daytime and nighttime bat surveys throughout the Project site (plus a 100-foot buffer as access allows) to check for signs of active bat use, including guano, urine staining, and bat vocalizations (detected using ultrasonic acoustic equipment). A discussion of survey results, including negative findings, shall be provided to the City and CDFW. If individual bats or active maternity roosts are identified, the Project proponent and qualified bat specialist shall consult with and receive written concurrence from California Department of Fish and Wildlife (CDFW) to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat colonies based on CDFW recommendations. No project activities shall occur within the established buffer area until a qualified biologist verifies the bat roost is no longer in use.</p> <p>If construction activities begin outside the bat maternity season (September 1 through March 31), a qualified bat specialist shall conduct a pre-construction survey no more than 14 days prior to vegetation removal to determine if bats are roosting in the project area. If roosting bats are detected, consultation with CDFW shall occur prior to vegetation removal to determine appropriate exclusion methods and timing restrictions. Any identified roost sites shall be monitored by a qualified bat specialist to ensure bats have vacated the roost prior to the start of construction activities. If no roosting bats are detected during the pre-construction survey, vegetation removal may proceed without restriction.</p>	Prior to Project activities	Project Proponent/ Bat Specialist

4-21

Docusign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 21 of 25

Mitigation Measure	Timing	Responsible Party
<p>Mitigation Measure #9: Tree Removal To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If bats are not detected, but the bat specialist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roost shall not be bucked or mulched immediately. A period of at least 24-48 hours, as determined by the bat specialist, shall elapse prior to such operations to allow bats to escape.</p>	During Project activities	Worker Personnel/ Bat Specialist
<p>Mitigation Measure #10: Bat Roost Compensatory Mitigation If the Project impacts confirmed bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified bat specialist. The qualified bat specialist shall prepare a management plan for the bat roost structures for CDFW to review and approve. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.</p>	Following Project activities	Project Proponent
<p>Mitigation Measure #11: Mitigation Measure BIO-1 The following measures shall be implemented prior to and during construction as follows: a) Within 3 days prior to the start of vegetation removal and/or ground disturbing activities (i.e., grading/excavations), a preconstruction biological resources</p>	Prior to and during Project activities	Project Proponent/

4-21

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 22 of 25

Mitigation Measure	Timing	Responsible Party
<p>clearance survey shall be conducted by the Project Biologist. The Biologist shall look for special status plant and animal species within the Project site. If a special status species is identified, it shall be avoided using temporary no-work buffers until the individual leaves on its own or is relocated pursuant to applicable regulations. Buffers shall be demarcated by the qualified biologist in coordination with CDFW and/or USFWS. CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as applicable to the identified species, and any permits needed for take of the species shall be obtained. Results of the survey shall be provided to the City.</p> <p>b) Prior to vegetation removal and/or ground disturbing activities (i.e., grading/excavations), the Biologist shall clearly delineate the limits of disturbance to avoid unplanned impacts within the non-buildable area.</p> <p>c) The Project Biologist shall conduct a worker education program at a pre-construction meeting that includes identification, avoidance and reporting procedures regarding nesting birds, bat maternity colonies, and special status plants and animals with a moderate or higher chance to occur on the Project site.</p> <p>d) If any special-status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.</p>		<p>Project Biologist</p>

4-21

Docusign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 23 of 25

Mitigation Measure	Timing	Responsible Party
<p>Recommendation #1: Adoption of Alternative 2 CDFW strongly recommends the City and Project proponent moves forward with the adoption of Alternative 2: Reduced Lot Size Design Alternative for the Project.</p>	Prior to adoption of final EIR	Lead Agency
<p>Recommendation #2: Fuel Modification Impacts The City should revise the DEIR to include a Fire Management Plan for public review. With respect to defensible space, the Fire Management Plan should fully describe and identify the location, acreage, and composition of defensible space within the Project site. The City through its planning processes, should ensure that defensible space is provided and accounted for within proposed development areas, and not included in any conservation areas. Additionally, the Fire Management Plan should outline compensatory mitigation to offset the permanent loss of natural vegetation.</p>	Prior to final EIR	Lead Agency
<p>Recommendation #3: Wildlife Fencing The City and Project proponent should consider placing a wildlife exclusion fence around the perimeter of the residential community to exclude mule deer and other potential prey for mountain lion from entering the residences. Wildlife fencing should be at least 12-feet tall with an overhang discouraging jumping. Fences should be made from sturdy material with gaps no larger than 4-inches.</p>	Prior to Project activities	Lead Agency/ Project Proponent
<p>Recommendation #4: Human-Wildlife Interaction To prevent human-wildlife conflicts within the Project site, the Project proponent should incorporate the following elements into the design of the residential development, as well as management and maintenance of the residences in perpetuity. These elements should be recorded in any HOA documents:</p> <ol style="list-style-type: none"> 1. Never feed deer or other wildlife; it is illegal to feed deer and other big game in California and it will attract mountain lions; 2. Deer-resistant/deterring landscape design, planting species that are less palatable to mule deer; 	Prior to Project activities and adoption of HOA documents	Project Proponent

4-21

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 24 of 25

Mitigation Measure	Timing	Responsible Party
<p>3. Trim bushes and shrubs to 2 to 3-feet above the ground to reduce hiding places for mountain lions and keep brush trimmed low; and,</p> <p>4. Install motion-sensitive lighting and consider installing additional deterrents around the residential development</p>		
<p>Recommendation #5: CEQA To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.</p>	Prior to final EIR	Lead Agency / Project Proponent
<p>Recommendation #6: USFWS Consultation CDFW recommends consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground disturbing activities and/or vegetation removal that may impact gnatcatcher.</p>	Prior to ground-disturbing activities	Project Proponent
<p>Recommendation #7: Lighting CDFW recommends the City incorporate a lighting plan in the final EIR that discusses the criteria used in selecting the types of light fixtures, a schedule detailing the hours various lights will be on, and steps taken to minimize adverse effects on wildlife species. Methods for minimizing adverse effects of artificial night lighting include lighting only where light is necessary, turning lights off when they are not in use (e.g., motion detector), only using as much light as is needed, directing the light only where it is needed, and using the lowest possible correlated color temperature for the goal of the lighting.</p>	Prior to final EIR	Lead Agency
<p>Recommendation #8: Landscaping CDFW recommends the City incorporate a planting palette in the final EIR, specifying the vegetation that will be used as landscaping for this Project. The Project proponent should use only native species found in naturally occurring vegetation communities within or adjacent to the Project site. The Project proponent should not plant, seed, or</p>	Prior to final EIR	Lead Agency/ Project Proponent

4-21

DocuSign Envelope ID: 7B713D80-5D70-431E-B237-7C89B374355E

Clare Lin
City of Sierra Madre
August 25, 2025
Page 25 of 25

Mitigation Measure	Timing	Responsible Party
otherwise introduce nonnative, invasive plant species to areas that are adjacent to and/or near native habitat areas. CDFW recommends the Project proponent restrict use of any species, particularly 'moderate' or 'high' listed by the California Invasive Plant Council. These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.		

4-21

Response No. 4

Victoria Tang, Environmental Program Manager, South Coast Region
California Department of Fish and Wildlife (CDFW)
August 25, 2025

Comment 4-1: The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report for the Ginkgo Stonehouse Residential Project pursuant to CEQA, expressing appreciation for the opportunity to provide comments and recommendations on project activities that may affect California fish and wildlife, as well as aspects of the project that may fall under CDFW's regulatory authority under the Fish and Game Code.

Response: The California Department of Fish and Wildlife ("CDFW" or "Commenter") acknowledges review of the DEIR and thanks the City for the opportunity to review aspects of the Project that relate to resources under CDFW's purview. No further response or action is required under CEQA.

Comment 4-2: CDFW serves as California's Trustee Agency for fish and wildlife resources, holding jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat, while also providing biological expertise during CEQA environmental review processes. As a potential Responsible Agency under CEQA, CDFW anticipates it may need to exercise regulatory authority over the Project, including potential lake and streambed alteration permits under Fish and Game Code Section 1600, and take authorization under the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA) if project implementation could result in "take" of protected species.

Response: The commenter provides a summary of their role as California's Trustee Agency for fish and wildlife resources, holding jurisdiction over conservation, protection, and management of fish, wildlife, native plants, and habitat. The comment outlines CDFW's authority to provide biological expertise during CEQA environmental review processes and identifies their potential role as a Responsible Agency under CEQA. The commenter notes they may need to exercise regulatory authority over the Project, including potential lake and streambed alteration permits under Fish and Game Code Section 1600, and take authorization under the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA) if project implementation could result in "take" of protected species. Based on the analysis provided in the DEIR Section 5.4, *Biological Resources*, no impacts to lake or streambed resources or "take" of a protected species are anticipated to occur. No further response or action is required under CEQA.

Comment 4-3: The Project, proposed by Ginkgo Stonehouse LLC, involves developing nine single-family residential lots on a 9-acre site at 935 East Grand View Avenue in Sierra Madre, with approximately four acres designated as non-buildable open space and requiring demolition of four existing residential structures before constructing new building pads, a private street with cul-de-sac, and associated infrastructure including retaining walls, utilities, and stormwater systems. The DEIR includes two alternatives: Alternative 1 (No Project) would maintain the current condition with existing structures, while Alternative 2 (Reduced Lot Size Design) would reduce the grading footprint by condensing four lots toward the south end of the site near East Grand View Avenue and eliminating the additional driveway and fire access road.

Response: The Commenter provides a summary of the Project Description, Project Alternatives, and location of the Project. No further response or action is required under CEQA.

Comment 4-4: The Project site is located at the base of the San Gabriel Mountains and contains diverse vegetation communities including arroyo willow thickets, coastal sage scrub, eucalyptus groves, and mixed coast live oak woodland, supporting 71 plant species and 27 wildlife species including five bat species identified during surveys. While focused surveys found no coastal California gnatcatcher (ESA-listed threatened) or Crotch’s bumble bee (CESA candidate endangered), the site potentially supports several species of concern including mountain lion (CESA candidate endangered), special concern bat species, and nesting birds and raptors, with the DEIR incorporating four mitigation measures addressing preconstruction surveys, tree replacement, nesting bird protection, and bat roosting surveys.

Response: The commenter provides a summary of the Project site’s biological conditions, vegetation communities, species survey results, and the DEIR’s biological mitigation measures. No further response or action is required under CEQA.

Comment 4-5: The Project construction is anticipated to span three years and will include demolition, site preparation, grading, building construction, paving, and architectural coating phases.

Response: The commenter provides a summary of the Project’s construction timeline and phases. No further response or action is required under CEQA.

Comment 4-6: CDFW previously reviewed the Project’s Notice of Preparation (NOP) and submitted comments to the City on November 8, 2023, addressing concerns related to mountain lion, western mastiff bat, rare plants, southern California legless lizard, and nesting birds and raptors.

Response: The commenter provides a summary of their previous NOP comment letter dated November 8, 2023, which is documented in Section 2.0, *Introduction*, [Table 2-1](#), *Summary of NOP Comments* (page 2-4) of the DEIR. The DEIR also provides an analysis of potential impacts to mountain lion, western mastiff bat, rare plants, southern California legless lizard, and nesting birds and raptors in DEIR Section 5.4, *Biological Resources*. No further response or action is required under CEQA.

Comment 4-7: CDFW strongly supports Alternative 2: Reduced Lot Size Design Alternative over the proposed Project, stating that the current design would result in greater adverse impacts to flora and fauna due to its larger grading footprint and greater encroachment into natural habitat, particularly coastal sage scrub in the northern portion of the site. CDFW notes that the Project site supports diverse vegetation communities connected to the San Gabriel Mountains and provides biological value to wildlife including five bat species and three bee species, and argues that Alternative 2 would be environmentally superior under CEQA Guidelines Section 15126.6(e)(2) because it would reduce impacts to natural habitat supporting CESA- and ESA-listed species by positioning development closer to existing development near East Grand View Avenue, eliminating the additional driveway and fire access road, reducing grading and fuel modification activities, and preserving more coastal sage scrub habitat for species like coastal California gnatcatcher and Crotch’s bumble bee.

Response: The commenter supports Alternative 2: Reduced Lot Size Design Alternative and provides their analysis of why this alternative would result in fewer biological impacts compared to the proposed Project. The Project Site does support six (6) vegetation community types; however, approximately half of the Project Site, where the concentration of Project development is proposed, is comprised of developed, disturbed, and/or ornamental areas as shown in the DEIR [Table 5.4-1](#) (page 5.4-3) and [Figure 5.4-1](#) (page 5.4-2). A total of 98 flora and fauna species were observed on the Project Site, approximately half (45) of

which are non-native species as noted in Appendix B, *Plant and Wildlife Species Observed within the Project Site* of the Biological Technical Report (DEIR, Appendix C). Nonetheless, the DEIR acknowledges the Project site, particularly the northern portion where the non-buildable open space is proposed, has habitat value and appropriate mitigation for biological resources is provided in Mitigation Measure BIO-1 and specific mitigation measures for protected trees, nesting birds, and bats are provided in Mitigation Measures BIO-2, BIO-3, and BIO-4, respectively. It should also be noted that results of the focus surveys conducted for the coastal California gnatcatcher (CAGN) and Crotch's bumble bee (CBB) were negative. While coastal sage scrub vegetation may be suitable for CAGN and CBB, there is no standard or regulation protecting loss of suitable or potentially suitable habitat that is unoccupied for a species under CESA or CEQA. The Project site does not contain USFWS-designated Critical Habitat.

The commenter's preference for Alternative 2 is noted. As analyzed in Section 6.9.4, *Biological Resources*, of the DEIR (page 6-12), Alternative 2 would result in "slightly reduced" impacts to biological resources compared to the proposed Project due to the reduced grading footprint and elimination of the additional driveway/fire access road. Section 6.11, *Environmentally Superior Alternative*, of the DEIR (pages 6-19 through 20) identifies Alternative 2 as the Environmentally Superior Alternative among the development alternatives pursuant to CEQA Guidelines Section 15126.6(e)(2). Both the proposed Project and Alternative 2 would result in less than significant impacts with mitigation incorporated for biological resources (Section 5.4.5, *Environmental Impact Analysis*, pages 5.4-18 to 5.4-27). The City will consider the commenter's input regarding their Recommendation #1 to adopt Alternative 2 during the decision-making process. No further response or action is required under CEQA.

Comment 4-8: CDFW is concerned that the DEIR inadequately addresses fuel modification activities' impacts on biological resources, noting that while the DEIR assigns fuel modification responsibility to individual lot owners as "maintenance," it fails to clearly define fuel modification zones, analyze impacts to vegetation communities and wildlife, or provide compensatory mitigation for habitat loss that constitutes permanent, ongoing impacts to natural resources. CDFW argues that fuel modification activities will result in perpetual direct and indirect impacts to plant communities and dependent species, potentially affecting CESA- and NPPA-protected species, and recommends the City revise the DEIR to include a comprehensive Fire Management Plan that fully describes defensible space locations and composition while requiring compensatory mitigation at a minimum 2:1 in-kind replacement ratio for natural vegetation impacted within fuel modification zones.

Response: The DEIR acknowledges that fuel modification/brush control activities will be required as part of the Project. As stated in Section 5.20.5, *Environmental Impact Analysis* (page 5.20-8), the Project would be required to comply with Section 17.52.170 - Fire Prevention and Landscaping Standards of the City's Municipal Code, which includes fuel modification/brush control requirements. DEIR pages 5.4-22 through 5.4-24 provides an impact analysis of the proposed Project, including potential impacts resulting from the proposed Project's potential fuel modification requirements. As stated in the DEIR, it should be noted that the impact acreages shown in DEIR Table 5.4-1 assume impacts to the entire 9-acre Project site and do not account for the approximately 4-acre portion of the Project site's non-buildable area that will be deed restricted to allow for only passive open space and maintenance purposes (i.e., brush management/fuel modification). According to the City of Sierra Madre's Municipal Code, Chapter 8.36 - Hazardous Brush Clearance, Section 8.36.030 - Specific requirements, 100 to 200 feet (as determined by the fire chief) of vegetation management must be maintained from residential structures. This requirement does not apply to the maintenance of trees, ornamental shrubbery, or plants, which are used as ground cover provided such do not provide a ready fuel supply to augment the spread or intensity of a fire. Because exact building locations and vegetation management requirements are not yet known, the most conservative potential impact numbers are used; however, most of the 4-acre non-buildable area vegetation is anticipated to

remain and the area is expected to be used for tree planting mitigation pursuant to Mitigation Measure BIO-2. Impacts to each vegetation community are analyzed and determined to be less than significant or less than significant with the implementation of Mitigation Measures BIO-1 and BIO-2. The DEIR provides the appropriate level of analysis in consideration of existing available information without the need for incorporating the commenter's Recommendation #2.

The DEIR's approach is consistent with the City's regulatory framework, which requires individual property owners to submit fire prevention plans showing fuel modification zones prior to building permit issuance, as referenced in Section 5.20.5 (page 5.20-9). The Sierra Madre Fire Department has provided preliminary approval indicating the Project would have adequate emergency access (Appendix I1, *Public Service/Utility Correspondence*). Additionally, the City's Municipal Code Section 17.52.170 establishes the regulatory framework for fire prevention and landscaping standards that will govern fuel modification activities.

The biological impacts analysis in Section 5.4.5 addresses potential impacts to vegetation communities and includes Mitigation Measures BIO-1 and BIO-2 (pages 5.4-28 through 5.4-29) to protect sensitive biological resources and provide tree replacement. The Project's compliance with existing City regulations, combined with the implemented mitigation measures, provides appropriate environmental protection while maintaining necessary fire safety standards. As noted above, there is no standard or regulation protecting loss of suitable or potentially suitable habitat that is unoccupied for a species under CESA or CEQA. Appropriate mitigation has been provided under Mitigation Measures BIO-1 and BIO-2 pursuant to CEQA that does not require incorporation of the commenter's proposed Mitigation Measure #1. No further response or action is required under CEQA.

Comment 4-9: CDFW is concerned that the Project may impact mountain lion (a CESA candidate threatened species with full protection under CESA) through habitat loss and increased human interaction, noting that the northern portion of the site provides wildlife access from the San Gabriel Mountains and serves as foraging habitat for mule deer, which are the primary food source for mountain lions in southern California. CDFW argues that the Project's residential development adjacent to wildland areas will likely increase human-wildlife conflicts and potentially lead to mountain lion relocations or euthanizations for public safety, and recommends mitigation measures including wildlife exclusion fencing around the residential perimeter, human-wildlife interaction protocols (prohibiting wildlife feeding, deer-resistant landscaping, vegetation management, and motion-sensitive lighting), procedures for mountain lion encounters during construction, potential incidental take permits if impacts cannot be avoided, and permanent prohibition of rodenticides within the Project site.

Response: The DEIR discusses the potential presence of mountain lions in Section 5.4.2, *Environmental Setting* (page 5.4-8), acknowledging that mountain lions may use the Project site as foraging habitat and that there have been observations of mountain lion in surrounding neighborhoods. However, the DEIR concludes that "the Project site is not a major linkage corridor between the site and the surrounding mountain ranges" due to existing barriers from "roadways, houses, buildings, and fences" that have created fragmented habitat. The analysis notes that "large and densely vegetated land in the nearby San Gabriel Mountains, to the north of the Project site, provides more suitable habitat for proper wildlife movement." The Project site currently has four (4) existing residential units situated on the southern half of the Project site, which is comprised of disturbed land and ornamental plants. The proposed Project would demolish the existing homes and would focus the proposed development of nine (9) homes predominantly in the southern half of the Project site, similar to existing conditions. Although portions of the Project site are linked to the San Gabriel Mountains through segments of undeveloped land, the Project site is situated within an existing residential community, with many homes located in closer proximity to the San Gabriel

Mountains compared to the Project site. Due to the presence of existing housing on the Project site, the proposed Project design, and location within an existing residential community, the incremental increase in potential direct and/or indirect human interaction with mountain lions, compared to existing conditions, is considered less than significant. Therefore, the commenter's Recommendation #3, Recommendation #4, and proposed Mitigation Measure #4 are not required pursuant to CEQA; however, the City has the authority to impose additional protective measures as conditions of approval if deemed warranted during the deliberation and decision-making process.

The DEIR's biological resources analysis in Section 5.4.5, *Environmental Impact Analysis*, found no special status wildlife species present on the Project site during surveys (page 5.4-19). The analysis acknowledges the mountain lion has "moderate potential to occur" but was not observed during biological surveys. Mitigation Measure BIO-1 (pages 5.4-28 through 5.4-29) requires preconstruction biological surveys, a worker education program regarding special status species, and requires CDFW and/or USFWS to be notified in accordance with the California Endangered Species Act (CESA) and/or Federal Endangered Species Act (FESA) if a listed species is observed, as applicable to the identified species, and to obtain an Incidental Take Permit, as required, if take of the species would occur. Mitigation Measure BIO-1 already covers the provisions in the commenter's proposed Mitigation Measure #2 and Mitigation Measure #3.

In addition, the Project design incorporates an approximately 4-acre non-buildable area that will continue to allow wildlife foraging, as noted in Section 5.4.5 under Impact BIO-4 (page 5.4-25). As noted above, there is no standard or regulation protecting loss of suitable or potentially suitable habitat that is unoccupied for a species under CESA or CEQA. No further response or action is required under CEQA.

Comment 4-10: CDFW is concerned that the Project may impact Crotch's bumble bee (a CESA candidate endangered species) through temporal or permanent loss of suitable nesting and foraging habitat in coastal sage scrub vegetation, noting that while the 2024 focused surveys did not detect the species, the site provides highly suitable ecological conditions and three other *Bombus* species were found. CDFW emphasizes that bumble bees move nest sites annually, requiring protocol-level surveys by CDFW-approved biologists each year of Project activities, and argues that without adequate annual surveys, ground and vegetation disturbance could result in incidental take of this critically imperiled species (State Ranking S1/S2) through burrow collapse, nest abandonment, reduced reproductive success, and direct mortality, recommending mitigation measures requiring annual focused surveys following CDFW protocols during the April-August flying season and coordination with CDFW for incidental take permits if the species is detected.

Response: The DEIR addresses Crotch's bumble bee (CBB) in Section 5.4.5, *Environmental Impact Analysis* (page 5.4-20), noting it is a CESA state listed candidate endangered species that "lives in grassland and scrub habitats in coastal California" and "nest in the ground, and prefer undisturbed habitat with native vegetation, which occurs within portions of the Project site." The analysis acknowledges that suitable pollen and nectar species were identified, "allowing for high potential for this species to occur;" however, the species "was not observed during the 2024 CBB focused surveys."

The DEIR's impact analysis in Section 5.4.5 (page 5.4-22) concludes that "no special status wildlife species are present on the Project site and no temporary or permanent impacts are anticipated." However, Mitigation Measure BIO-1 (pages 5.4-28 through 5.4-29) requires that within 3 days prior to vegetation removal, "a preconstruction biological resources clearance survey shall be conducted by the Project Biologist" to look for special status species that may have colonized the site. If a special status species is identified, the measure requires avoidance using temporary buffers and notification of CDFW in accordance with CESA, with any required permits obtained for take authorization.

While the DEIR includes preconstruction surveys through Mitigation Measure BIO-1, it does not specifically require annual protocol-level surveys during the species' flying season as recommended by the commenter, because these surveys have already been completed. The 2024 CBB protocol surveys are only one year old and are considered reliable. In addition, there is no standard or regulation protecting loss of suitable or potentially suitable habitat that is unoccupied for a species under CESA or CEQA. It can be noted, however, that the Project design incorporates an approximately 4-acre non-buildable area that will continue to allow wildlife foraging, as noted in Section 5.4.5 under Impact BIO-4 (page 5.4-25). The 2024 CBB protocol surveys and Mitigation Measure BIO-1 appropriately cover potential impacts to CBB. The existing mitigation provides protection through preconstruction surveys and coordination with CDFW if the species is detected during the preconstruction biological resources clearance survey, which addresses the commenter's concerns about potential incidental take. The commenter's proposed Mitigation Measure #5, Mitigation Measure #6, and Recommendation #5 are not required under CEQA. No further response or action is required under CEQA.

Comment 4-11: CDFW is concerned that the Project may impact coastal California gnatcatcher (an ESA-listed threatened species and California Species of Special Concern) through permanent loss of nesting and foraging habitat from grading and vegetation removal in coastal sage scrub, and potential nest abandonment, reproductive suppression, or direct mortality during breeding season if ground-disturbing activities occur without appropriate surveys. CDFW notes that while 2024 focused surveys did not detect the species, subsequent protocol-level surveys should be conducted to accurately determine presence or absence, and recommends consultation with USFWS to comply with the Endangered Species Act and implementation of mitigation measures requiring qualified biologists with USFWS permits to conduct surveys following the official Coastal California Gnatcatcher Presence/Absence Survey Protocol (minimum six surveys from March 15-June 30 or nine surveys from July 1-March 14) prior to the City's issuance of grading permits.

Response: The DEIR addresses coastal California gnatcatcher (CAGN) in Section 5.4.2, *Environmental Impact Analysis* (pages 5.4-20 through 5.4-21), noting it is "a Federally Threatened species and CDFW Species of Special Concern" that "is an obligatory, permanent resident of coastal sage scrub below 835 meters in Southern California." The analysis acknowledges that "suitable habitat for the species occurs within the Project site" but states that "this species was not observed during the CAGN focused surveys."

The DEIR's impact analysis in Section 5.4.5 (page 5.4-22) concludes that "no special status wildlife species are present on the Project site and no temporary or permanent impacts are anticipated." Mitigation Measure BIO-1 (pages 5.4-28 through 5.4-29) requires preconstruction biological surveys within 3 days prior to vegetation removal to look for special status species that may have colonized the site. If a special status species is identified, the measure requires avoidance using temporary buffers and states that "CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as applicable to the identified species, and any permits needed for take of the species shall be obtained."

While the DEIR includes preconstruction surveys and coordination with regulatory agencies if species are detected, it does not specifically require the comprehensive protocol-level surveys following the official USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol as recommended by the commenter, because these surveys have already been completed. The 2024 CAGN protocol surveys are only one year old and are considered reliable. In addition, there is no standard or regulation protecting loss of suitable or potentially suitable habitat that is unoccupied for a species under CESA or CEQA. The Project site is not occupied by CAGN and does not contain USFWS designated critical habitat for CAGN. It can be noted, however, that the Project design incorporates an approximately 4-acre non-buildable area that will continue to allow wildlife foraging, as noted in Section 5.4.5 under Impact BIO-4 (page 5.4-25). The 2024

CAGN protocol surveys and Mitigation Measure BIO-1 appropriately cover potential impacts to CAGN if the species is detected during the preconstruction biological resources clearance survey. The commenter's proposed Recommendation #6 and proposed Mitigation Measure #7 are not required under CEQA. No further response or action is required under CEQA.

Comment 4-12: CDFW is concerned that Mitigation Measure BIO-4 inadequately addresses Project impacts on bat species and potential maternity roosts, noting that the Project would remove trees and vegetation that could result in direct bat mortality or roost disturbance, and that surveys detected five bat species with activity levels suggesting potential roosting sites or maternity colonies within the Project site. CDFW argues that without compensatory mitigation to offset the loss of bat roosting habitat, the Project would contribute to cumulative habitat loss on local and regional scales, and recommends revising Mitigation Measure BIO-4 to require qualified bat specialists to conduct comprehensive daytime and nighttime surveys with CDFW consultation, implementing specific tree removal protocols during non-maternity seasons with careful procedures to allow bat escape, and providing compensatory mitigation through artificial bat roost structures designed and managed in coordination with CDFW to ensure no net loss of bat-roosting habitat.

Response: The DEIR discusses potential impacts to bats in Section 5.4.2, *Environmental Setting* (page 5.4-9). The DEIR disclosed that the bat survey results included the detection of five species of bats that occur throughout Southern California, the Yuma myotis (*Myotis yumanensis*), California myotis (*Myotis californicus*), Canyon bat (*Parastrellus hesperus*), big brown bat (*Eptesicus fuscus*), and Mexican free-tailed bat (*Tadarida brasiliensis*). These species detected during the surveys are commonly found throughout Southern California and are not protected as listed species by state or federal laws (i.e., endangered or threatened). The commenter's discussion of bats that are a species of special concern (SSC) is not applicable to the Project because no SSC bats were detected during the focused daytime and nighttime emergence bat surveys. The 2024 bat focus surveys are only one year old and are considered reliable.

Out of the five detected bat species, two species, the California myotis and canyon bat had the most calls detected suggesting they are more prevalent within the Project site. This could also indicate there is a roosting site and/or maternity colony either within the Project site or adjacent to the Project site but none were observed. Mitigation Measure BIO-4 would verify no colonies are onsite before construction and provides additional mitigation if a colony is detected. These species of bats are not state or federally protected; however, maternity colonies are granted protection through Section 4150 of the California Fish and Game Code (CFGC). Appropriately, Mitigation Measure BIO-4 (page 5.4-30) requires pre-construction bat roost surveys and states that "if active maternity roosts are identified, the project shall consult with California Department of Fish and Wildlife (CDFW) to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat maternity colonies based on CDFW recommendations." The measure also requires that "no project activities shall occur within the established buffer area until a qualified biologist verifies the maternity roost is no longer in use." Mitigation Measure BIO-4 appropriately addresses potential impacts resulting from the removal of trees, tree encroachment, and vegetation removal within the disturbance footprint, which could otherwise result in direct mortality of individual bats or roost disturbance via increased noise disturbances, human activity, dust, ground-disturbing activities (e.g., staging, access, grading, excavating, paving), and vibrations caused by heavy equipment.

It should also be noted that the Project design incorporates an approximately 4-acre non-buildable area that will continue to allow wildlife foraging and provide roosting habitat. No long-term permanent impacts are anticipated because the Project site would retain adequate roosting and foraging habitat in the post-construction condition within the landscaped areas of the development and within the non-buildable area

(DEIR page 5.4-26). With the avoidance of the non-buildable area onsite, and the marginal role the Project site plays in local wildlife dispersal and foraging, roosting is expected to continue. Therefore, the Project would not result in a cumulatively considerable contribution to impacts to nursery sites (DEIR 5.4-28). The current Mitigation Measure BIO-4 adequately addresses conditions proposed in the commenter's proposed Mitigation Measure #8, proposed Mitigation Measure #9, and proposed Mitigation Measure #10. No further response or action is required under CEQA.

Nonetheless, the City has agreed to revise Mitigation Measure BIO-4 and to require additional Mitigation Measures BIO-4b and BIO-4c based on CDFW's recommendations to ensure protection of bats. The measures are as follows:

BIO-4a: Pre-Construction Roosting Bat Survey. Prior to vegetation removal occurring between April 1 and August 31, the Project proponent shall retain a qualified Biologist (i.e., familiar with bat species and with conducting bat surveys) to conduct at least one daytime and one nighttime bat survey throughout the Project site (plus a 100-foot buffer as access allows) a pre-construction bat roost survey shall be conducted to check for signs of active bat use, including guano, urine staining, and bat vocalizations (detected using ultrasonic acoustic equipment). Additional surveys may also be conducted, as recommended by the qualified Biologist, if the initial survey results are inconclusive. A discussion of survey results, including negative findings, shall be provided to the City and, if active maternity roosts are identified, to the California Department of Fish and Wildlife (CDFW). If active maternity roosts are identified, the Project proponent and qualified Biologist shall consult with and receive written concurrence from the California Department of Fish and Wildlife (CDFW) to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat maternity colonies based on CDFW recommendations. No project activities shall occur within the established buffer area until a qualified Biologist verifies the maternity roost is no longer in use.

If construction activities begin outside the bat maternity season (September 1 through March 31), a qualified Biologist shall conduct a at least one pre-construction survey no more than 14 days prior to vegetation removal to determine if bats are day-roosting in the project area. If day-roosting bats are detected, consultation with CDFW shall occur prior to vegetation removal to determine appropriate exclusion methods and timing restrictions. Any identified day-roost sites shall be monitored by a qualified Biologist to ensure bats have vacated the roost prior to the start of construction activities. No project activities shall occur within the established buffer area until a qualified Biologist verifies the day-roost can be humanely evicted/excluded. If no roosting bats are detected during the pre-construction survey, vegetation removal may proceed without restriction.

BIO-4b: Tree Removal. To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If the qualified Biologist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw where the terrain and site conditions allow to be done safely. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a qualified Biologist. Trees that are known to be a bat roost shall not be bucked or mulched immediately. A period of at least 24-48 hours, as determined by the qualified Biologist, shall elapse prior to such operations to allow bats to escape.

BIO-4c: Bat Roost Compensatory Mitigation. If the Project impacts occupied maternity bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified Biologist. The qualified Biologist shall prepare a management plan for the bat roost structures for CDFW to review and approve. If CDFW does not respond within 30 days, the plan shall be considered approved. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.

Comment 4-13: CDFW recommends revising Mitigation Measure BIO-1 to strengthen preconstruction biological resource protection by requiring the Project Biologist to survey for special status plant and animal species with at least moderate potential to occur on site (rather than just those observed), establish temporary no-work buffers in coordination with CDFW and/or USFWS when special status species are identified, obtain necessary permits for any potential take under CESA and/or FESA, include special status species identification and avoidance procedures in worker education programs, and implement formal reporting requirements to CDFW and the City within three calendar days if any special-status wildlife are found, harmed, or discovered dead or injured, with work stoppage until proper notifications are made and additional mitigation measures are identified.

Response: The current Mitigation Measure BIO-1 (pages 5.4-28 through 5.4-29) requires that within 3 days prior to vegetation removal, “a preconstruction biological resources clearance survey shall be conducted by the Project Biologist” to look for “special status plant and animal species with at least a moderate or higher potential to colonize the Project site.” The measure already includes requirements for temporary no work buffers, notification of CDFW and/or USFWS “in accordance with CESA and/or FESA, as applicable to the identified species,” obtaining necessary permits for take authorization, worker education programs, and providing survey results to the City. The City has determined that Mitigation Measure BIO-1 adequately addresses potential impacts to special status species. No further response or action is required under CEQA.

Nonetheless, the City has agreed to revise Mitigation Measure BIO-1 based on CDFW’s recommendations to enhance the existing mitigation by: (1) requiring surveys for all special status species with moderate potential or higher, rather than just those that may have colonized the site, (2) coordination specifically with CDFW and/or USFWS establishing buffers for CESA and/or FESA species if discovered, (3) adding formal three-day reporting requirements for any special status wildlife found, harmed, or discovered dead or injured, and (4) requiring work stoppage until proper notifications are made. The revised measure is as follows:

BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources. The following measures shall be implemented prior to and during construction as follows:

- a) Within 3 days prior to the start of vegetation removal and/or ground disturbing activities (i.e., grading/excavations), a preconstruction biological resources clearance survey shall be conducted by the Project Biologist. The Biologist shall look for special status plant and animal species within ~~at least a moderate or higher potential to colonize~~ the Project site. If a special status species is identified, it shall be avoided using temporary no-work buffers until the individual leaves on its own or is relocated pursuant to applicable regulations. Buffers for CEQA and/or FESA species shall be demarcated by the qualified biologist in coordination with CDFW and/or USFWS. CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as

applicable to the identified species, and any permits needed for take of the species shall be obtained. Results of the survey shall be provided to the City.

- b) Prior to vegetation removal and/or ground disturbing activities (i.e., grading/excavations), the Biologist shall clearly delineate the limits of disturbance to avoid unplanned impacts within the non-buildable area.
- c) The Project Biologist shall conduct a worker education program at a pre-construction meeting that includes identification, avoidance and reporting procedures regarding nesting birds, bat maternity colonies, and special status plants and animals with a moderate or higher chance to occur on the Project site.
- d) If any CEQA or FESA protected wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

Comment 4-14: CDFW recommends the City incorporate a lighting plan in the final EIR that addresses artificial night lighting impacts on plants and wildlife, including criteria for light fixture selection, lighting schedules, and steps to minimize adverse effects on wildlife through measures such as lighting only where necessary, using motion detectors to turn lights off when not in use, using minimum necessary light levels, directing light only where needed, and using the lowest possible correlated color temperature appropriate for the lighting purpose.

Response: The DEIR addresses lighting impacts in Section 5.1.5, *Environmental Impact Analysis*, under Impact AES-4 (pages 5.1-7 to 5.1-8), concluding that lighting impacts would be less than significant. The analysis notes that the Project would be required to comply with Section 17.52.200 - Lighting of the Municipal Code and Ordinance 1413, which requires lighting to follow the City's "Dark Sky" objectives and policies, including requirements that lighting be "shielded and directed downward to reflect away from adjoining properties."

The City's General Plan includes comprehensive dark sky policies in the Resource Management Element (page 5.1-4), including Policy R6.1 requiring light fixtures that "shield the light source so that light is cast downward to avoid light spillage offsite or upward into the sky," Policy R6.2 discouraging "continuous all-night exterior lighting" and encouraging "motion-sensor lighting," and Policy R8.2 requiring that "lighting in and near residential areas shall be minimal and shielded to prevent nuisance glare." Additionally, Policy L17.5 in the Land Use Element (page 5.1-3) requires that "exterior lighting be directed away from adjacent properties and the night sky."

The DEIR addresses lighting impacts from an aesthetic perspective and includes regulatory compliance requirements that incorporate many wildlife-friendly lighting practices. No further response or action is required under CEQA.

Comment 4-15: CDFW recommends the City incorporate a planting palette in the final EIR specifying landscaping vegetation, with the Project proponent using only native species found in naturally occurring vegetation communities within or adjacent to the Project site and avoiding planting nonnative, invasive plant species near native habitat areas, particularly restricting use of any species listed as ‘moderate’ or ‘high’ by the California Invasive Plant Council due to their documented substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

Response: The DEIR addresses vegetation and landscaping in several sections. Section 5.4.2, *Environmental Setting*, identifies the existing vegetation communities on the Project site, including coastal sage scrub, mixed coast live oak woodland, and other native plant communities (pages 5.4-3 to 5.4-5). The Project would be subject to the City’s General Plan policies, including Policy L15.4 (page 5.4-15), which requires limiting “the use of irrigation systems in landscaping to comply with water conservation measures and provide for natural habitat and erosion control.”

The DEIR notes in Section 5.4.5, *Environmental Impact Analysis*, that the Project incorporates a 4-acre non-buildable area that “is expected to be used for tree planting mitigation” (page 5.4-23). Additionally, Mitigation Measure BIO-2 (page 5.4-29) requires a Tree Replacement and Preservation Plan that would address “replacement ratio and species requirements” and must comply with the City’s Municipal Code requirements.

The City’s Municipal Code Section 17.52.100 (Permit Application Contents) requires vegetation mapping and Section 17.52.180 (Biotic Resources Management Plan Requirements) requires biotic resources management plans that address native plant species and the elimination of invasive non-native species (page 5.4-26). These existing requirements provide a framework for appropriate plant selection.

The DEIR includes regulatory requirements that address native vegetation preservation and replacement, and the City’s Municipal Code requires elimination of invasive species. No further response or action is required under CEQA; however, the commenter’s recommendation for a specific planting palette restricting California Invasive Plant Council-listed species is noted and will be considered during the decision-making process and could be incorporated as a condition of approval if deemed warranted.

Comment 4-16: CDFW recommends the Project’s environmental document include the mitigation measures recommended in their comment letter and has provided a Draft Mitigation Monitoring and Reporting Plan (Attachment A) to assist in developing feasible, specific, detailed, and fully enforceable mitigation measures that identify responsible parties, timing, specific actions, and locations in accordance with CEQA Guidelines Section 15097 and Public Resources Code Section 21081.6, with CDFW offering to coordinate with the City to further review and refine the Project’s mitigation measures.

Response: Based on DEIR Section 5.4, *Biological Resources*, the document establishes a comprehensive mitigation framework that addresses the core regulatory requirements and species protection measures that CDFW is referencing. In addition, certain mitigation measures have been modified and additional measures have been added, as described above, to clarify and/or augment Project requirements. The Final EIR includes a Mitigation Monitoring and Reporting Program (MMRP) with mitigation measures across all CEQA issue areas, including those for biological resources. No further response or additional actions are required under CEQA.

Comment 4-17: CDFW requires that any special status species and natural communities detected during Project surveys be reported to the California Natural Diversity Database (CNDDDB) and that information on special status native plant populations and sensitive natural communities be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form, in accordance with CEQA requirements that environmental information be incorporated into databases for use in subsequent environmental determinations, with the City responsible for ensuring proper data submission.

Response: The comment is noted. No further response or action is required under CEQA.

Comment 4-18: CDFW notes that the Project would have impacts on fish and/or wildlife, requiring assessment of environmental document filing fees that are payable upon filing of the Notice of Determination by the City to help defray CDFW's environmental review costs, with payment of these fees required for the underlying project approval to be operative, vested, and final under California Code of Regulations Title 14 Section 753.5, Fish and Game Code Section 711.4, and Public Resources Code Section 21089.

Response: Filing fees will be paid upon filing the Notice of Determination, which is a standard procedure. No further response or action is required under CEQA.

Comment 4-19: CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources, and requests the opportunity to review and comment on the City's response to their comments and to receive notification of any forthcoming hearing dates for the Project under CEQA Guidelines Section 15073(e), with future questions or coordination directed to Julisa Portugal, Senior Environmental Scientist (Specialist).

Response: The comment is noted. Responses to comments will be provided to CDFW pursuant to CEQA. No further response or action is required under CEQA.

Comment 4-20: CDFW provided references supporting their comments, including research on lighting impacts on wildlife (Barrientos et al. 2023), mountain lion conservation petitions and depredation studies, CDFW guidance documents for bumble bee surveys and species conservation, and scientific literature on recreation-related wildlife disturbance, demonstrating the scientific basis for their recommended mitigation measures and regulatory concerns regarding the Project's potential impacts on biological resources.

Response: The commenter's provision of supporting scientific literature and regulatory guidance documents is acknowledged. The City will consider the scientific information provided by CDFW along with the analysis contained in the DEIR when making decisions regarding the Project's potential impacts on biological resources and appropriate mitigation measures.

Comment 4-21: CDFW provides Attachment A: Draft Mitigation Monitoring and Reporting Program (MMRP) that provides language to be incorporated into the MMRP for the Project.

Response: Mitigation measure modifications are previously discussed above and will be updated and incorporated into the MMRP for the Project. No further response or action is required under CEQA.

COMMENT LETTER NO. 5

From: deb sheridan [REDACTED]
Sent: Thursday, August 28, 2025 5:17 PM
To: EIR Comments <eircomments@sierramadrea.gov>
Subject: [EXTERNAL] Proposed Ginkgo Stonehouse Residential Project (TTM No. 65348)

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

The concerns I have regarding environmental changes because of this project are:

1. The infrastructure. Will there be soil testing before any of the digging for the infrastructure begins? Residents have reported that their hired experts are still finding unacceptable levels of toxins. I would also request a mechanism for monitoring the "ground shaking" and destruction by the building of the roads and the houses. We learned during the building on the One Carter property what can happen to the residents' properties. There needs to be a way to address this problem.

5-1

2. Air quality - "pollutants are less than significant." We are still battling the pollutants in our air, in our homes, in our pools from the recent wildfire as well as in our soil. How will this be mitigated? How will it be monitored?

5-2

3. Nesting birds - who will monitor this? This is such a beautiful wooded area of Sierra Madre, and we know that for several types of birds, this is their home. Just think of the devastation we have seen by the increase in wildlife on our properties because of our fires, especially the latest one. A rare bald eagle has been spotted in this area in the past. How will the trees be protected, which will be selected to be removed? I suggest the developer work with the residents who are contiguous to those properties. What is the penalty for removing protected trees? Once again, I am asking because of the bad experience in the past. How will the biologist be selected?

5-3

4. Water - Where will the water come from for nine very large homes and nine acres? Global warming is a reality, and more wildfires are predicted. We need water to fight the fires.

5-4

5. Glare - "less than significant" - A Dark Skies ordinance was instituted in the General Plan. What measures will be taken to comply? The current fad is to place tea lights on everything. These need to be banned, to better comply with Dark Skies.

5-5

6. Fences - this is a corridor for wildlife, and we would request no fences or walls be allowed around the outside of the entire property, and any fence or wall on an individual lot should be restricted to five feet maximum. A safe ingress and egress is needed on Grand View, which is another reason to not allow fences or walls, which could block the view of pedestrians and drivers.

5-6

Debora Sheridan
Valle Vista Drive

Response No. 5

Debora Sheridan
Resident
August 28, 2025

Comment 5-1: The commenter raises concerns about infrastructure impacts, specifically requesting soil testing before excavation begins due to residents' reports of unacceptable toxin levels found by their hired experts, and requests a monitoring mechanism for ground shaking and property damage during road and house construction, citing previous issues experienced by residents during construction of the One Carter property that need to be addressed to prevent similar problems.

Response: Regarding the commenter's concerns about potential toxins in soils and potential need for soil testing, the commenter's example of referenced residents' reports prepared by hired experts does not indicate the purpose of why such reports were prepared, the location of where the testing was done relative to the Project Site, or the type of toxins or concentration-levels that are of concern. Without such details, there is not enough information to evaluate the potential relationship and/or risk-level of encountering toxins at the Project site. The DEIR addresses hazardous materials in Section 5.9, *Hazards and Hazardous Materials*, which includes analysis of potential soil contamination. DEIR page 5.9-12 discusses results of the Phase I Environmental Site Assessment (DEIR, Appendix F), which was prepared to determine if any significant surface or subsurface property contamination caused by hazardous or toxic substances should be considered during the Project's construction and operational phases. The site assessment included a review of available federal and state data reported by Environmental Database Report (EDR), available regulatory agency environmental records, available site history and records, available historic aerials, and a field survey. As detailed in the Environmental Setting Section 5.9.2, *Environmental Setting* (pages 5.9-1 5.9-5), the Project site was not identified as having any recognized environmental conditions (RECs) that could potentially result in a significant impact during Project construction or operations. Mitigation HAZ-1 is required to manage potential asbestos containing materials and potential lead-based paint during demolition of the existing structures, but there is no evidence of potential soil contamination indicating the need for additional soil testing.

Regarding the commenter's concerns about ground shaking and property damage during road and house construction (based on the One Carter property), it is not clear by the comment what the specific circumstances of the One Carter property are or how such circumstances may relate to the potential for ground shaking and property damage resulting from implementation of the proposed Project. The DEIR analyzes the proposed Project's potential for causing ground-shaking and damage resulting from excessive groundborne vibration during construction in Section 5.13, *Noise*. The DEIR's analysis is based on results of the Project's Noise Impact Study (DEIR, Appendix H). The DEIR discusses on pages 5.13-12 through 5.13-14 that Project construction would not involve the use of substantial vibration inducing equipment or activities, such as pile drivers. In addition, no historical or fragile buildings are known to be located within the Project vicinity, which may be more susceptible to potential damage from vibration. The main sources of vibration impact during Project construction would be the operation of larger equipment such as bulldozer activity during demolition, loading trucks during grading and excavation, and vibratory rollers during paving. The demolition stage (20 days), grading stage (20 days), and paving stage (20 days) are collectively estimated to last a total of 60 working days. The remaining construction duration is not expected to generate notable levels of vibration. As shown in DEIR Table 5.13-7, calculated vibration levels compared to the criteria shown in DEIR Table 5.13-5 and Table 5.13-6 would result in instances of distinctly perceptible vibration for occupants but no potential for building damage (page 5.13-13). Neither strongly

perceptible nor severely perceptible vibration occurrences are anticipated. In addition, distinctly perceptible vibration levels would be short-term and transient for a particular receptor as the construction equipment moves from one location to another on the Project site. Project construction would also be restricted to the City's permitted daytime hours pursuant to the Municipal Code. Based on the DEIR analysis as summarized above, potential impacts are considered less than significant. No further response or action is required under CEQA.

Comment 5-2: The commenter expresses concern about air quality impacts, questioning the DEIR's conclusion that pollutants are "less than significant" given ongoing contamination in air, homes, pools, and soil from recent wildfires, and requests information on how air quality impacts will be mitigated and monitored during Project construction and operation.

Response: DEIR Section 5.3, *Air Quality*, addresses air quality in Section 5.3.5, *Environmental Impact Analysis* (pages 5.3-8 to 5.3-15), which analyzes potential impacts from both construction and operational activities based on technical modeling using the California Emissions Estimator Model (CalEEMod) and established South Coast Air Quality Management District (SCAQMD) significance thresholds.

As shown in Tables 5.3-3 through 5.3-6 (pages 5.3-10 to 5.3-12), the Project's construction and operational emissions would remain below SCAQMD's regional and localized significance thresholds for all criteria pollutants including nitrogen oxides, carbon monoxide, particulate matter, and volatile organic compounds. The analysis concludes that impacts would be less than significant without requiring additional mitigation measures. The Project would be required to comply with mandatory SCAQMD rules including Rule 403 (Fugitive Dust), which requires standard dust control measures during construction such as watering exposed areas, covering haul trucks, and limiting vehicle speeds on unpaved surfaces. For operations, the residential nature of the Project would generate minimal ongoing air quality impacts.

The commenter references concern about wildfire-related contamination; the CEQA analysis focuses on Project-specific emissions and their contribution to regional air quality based on established regulatory standards. No further response or action is required under CEQA.

Comment 5-3: The commenter raises concerns about nesting bird protection and monitoring, emphasizing the area's value as habitat for various bird species including a rare bald eagle that has been spotted previously, and questions who will monitor compliance, how trees will be protected and selected for removal, what penalties exist for removing protected trees, and how the biologist will be selected. The commenter also requests that the developer work with contiguous residents on these issues and expresses concern about wildlife displacement from recent fires, referencing past negative experiences that inform their concerns about proper oversight and enforcement.

Response: The DEIR addresses birds and tree preservation issues in Section 5.4, *Biological Resources*, which includes Mitigation Measure BIO-3 (pages 5.4-29 through 5.4-30) requiring nesting bird season restrictions and pre-construction surveys. This measure requires that if vegetation removal occurs during nesting season (February 1 through September 15), a qualified biologist must conduct surveys within 3 days prior to construction activities to determine if active nests are present. The measure establishes protective buffers around active nests (300 feet for passerine birds, 500 feet for raptors, such as the bald eagle) and requires monitoring by a qualified biologist until nests are no longer active. Mitigation measure BIO-3 defines a qualified biologist as one familiar and experienced with the identification and life histories of wildlife and plant species in southern California. The Project Applicant typically contracts directly with a biologist or biologist consulting firm to perform the required surveys and monitoring and to prepare the reports documenting compliance with the applicable mitigation measures.

Regarding tree protection, Mitigation Measure BIO-2 (page 5.4-29) requires preparation of a Tree Replacement and Preservation Plan by a certified arborist that must comply with Sierra Madre Municipal Code Chapter 12.20 (Tree Preservation and Protection). Measure BIO-2 requires the final plan to be based on recommended mitigation measures, tree protection measures, and measures for the removal of polyphagous shot hole borer trees as detailed in the *Stonehouse Project Arborist Report* dated March 2016. The Tree Replacement and Preservation Plan shall address replacement ratio and species requirements, tree relocation feasibility, tree protection measures, and monitoring of post-planting success. The City's Municipal Code establishes penalties for unauthorized tree removal and requires permits for removal of protected trees.

The City would oversee compliance of mitigation measures BIO-2 and BIO-3 through its standard inspection and enforcement procedures during construction and through implementation of the Project's Mitigation Monitoring and Reporting Program (MMRP), which contains the complete list of required mitigation measures under CEQA and details responsible parties and timing requirements. Survey and monitoring reports prepared by the qualified biologist and implementation of the Tree Replacement and Preservation Plan prepared by a certified arborist would provide supporting documentation for MMRP compliance and monitoring. No further response or action is required under CEQA.

Comment 5-4: The commenter raises concerns about water supply for nine large homes on nine acres, questioning the source of water given global warming realities and increased wildfire predictions, and emphasizes the need to preserve water resources for firefighting purposes in the context of anticipated future fire risks.

Response: The commenter's concerns about water supply and fire protection are noted. DEIR Section 5.19, *Utilities and Service Systems*, addresses water supply in Section 5.19.5, *Environmental Impact Analysis*, under Impact USS-2 (pages 5.19-18 to 5.19-19), which analyzes whether the Project would have sufficient water supplies during normal, dry, and multiple dry years. The analysis relies on the Sierra Madre Water District's 2020 Urban Water Management Plan, which demonstrates 100% water reliability through 2045 under all conditions including multiple dry years.

As shown in Tables 5.19-3 through 5.19-5 (page 5.19-3), the Sierra Madre Water District has balanced supply and demand projections from 2025 to 2045, with supply sources including local groundwater from the Raymond Basin and imported water. The Project's water demand would be within the District's planning assumptions since it is consistent with the General Plan's land use designation.

Regarding fire protection, the Water Study (DEIR, Appendix I2) referenced in the DEIR demonstrates that the proposed water system would meet required fire flow at the maximum elevation of 860 feet while maintaining minimum residual pressure of 20 pounds per square inch. Section 5.20.5, *Environmental Impact Analysis*, under Impact WF-3 (page 5.20-9) confirms that the Project would have adequate fire flow capacity.

The Project would also be required to comply with water conservation measures including CAL Green requirements and the State Model Water Efficient Landscape Ordinance. The CEQA analysis is based on current planning documents and regulatory requirements that account for drought conditions and long-term supply reliability. No further response or action is required under CEQA.

Comment 5-5: The commenter questions the DEIR's conclusion that glare impacts are "less than significant," noting that Sierra Madre has instituted a Dark Skies ordinance in the General Plan and asking what measures will be taken to comply with this ordinance. The commenter also suggests banning decorative tea lights to better comply with Dark Skies

requirements, citing their proliferation as a current design trend that conflicts with dark sky preservation goals.

Response: DEIR Section 5.1, *Aesthetics*, addresses lighting impacts in Section 5.1.5, *Environmental Impact Analysis*, under Impact AES-4 (pages 5.1-7 to 5.1-8), which concludes that lighting impacts would be less than significant. The analysis notes that the Project would be required to comply with Section 17.52.200 (Lighting) of the Municipal Code and Ordinance 1413, which requires lighting to follow the City's "Dark Sky" objectives and policies, including requirements that lighting be "shielded and directed downward to reflect away from adjoining properties."

The City's General Plan includes comprehensive dark sky policies referenced in Section 5.1.3, *Regulatory Setting* (pages 5.1-3 to 5.1-4), including Policy R6.1 requiring light fixtures that "shield the light source so that light is cast downward to avoid light spillage offsite or upward into the sky," Policy R6.2 discouraging "continuous all-night exterior lighting" and encouraging "motion-sensor lighting," and Policy R8.2 requiring that "lighting in and near residential areas shall be minimal and shielded to prevent nuisance glare."

The Project would be subject to these existing regulatory requirements during the design review and permitting process. The City's Municipal Code and General Plan policies establish the framework for dark sky compliance, and the Project would need to demonstrate conformance with these requirements as part of the standard approval process.

The commenter's specific suggestion regarding decorative lighting restrictions would be a matter for City policy consideration beyond the scope of this individual project's environmental review. Such suggestions could be forwarded to the appropriate City departments for consideration in future policy updates. No further response or action is required under CEQA.

Comment 5-6: The commenter expresses concern about wildlife corridor preservation, requesting that no fences or walls be allowed around the outside perimeter of the entire property and that any fencing on individual lots be restricted to a maximum height of five feet to maintain wildlife movement. The commenter also cites traffic safety concerns, noting that fences or walls could block sight lines for pedestrians and drivers on Grand View Avenue, potentially creating hazards for safe ingress and egress.

Response: The DEIR addresses wildlife movement in Section 5.4.5, *Environmental Impact Analysis*, under Impact BIO-4 (pages 5.4-25 to 5.4-26), which concludes that the Project would not interfere substantially with wildlife movement. The analysis notes that while "the vegetated northern portion of the Project site allows for wildlife to enter the site from the San Gabriel Mountains," the Project site "is not a major linkage corridor between the site and the surrounding mountain ranges" due to existing barriers from "roadways, houses, buildings, and fences."

The City's General Plan includes wildlife protection policies referenced in Section 5.4.3, *Regulatory Setting* (page 5.4-15), including Policy R5.1 which "actively enforce[s] regulations prohibiting spiked iron fencing." Additionally, Section 17.48.130 (Walls and Fences) of the Municipal Code referenced in the DEIR states that "spiked fencing shall be prohibited in all zones" and "barbed wire fencing shall be prohibited in all residential zoned property."

The Project proposes an approximately 4-acre non-buildable area that would "continue to allow for wildlife foraging" (page 5.4-25) as noted in the biological resources analysis. However, the DEIR does not include specific restrictions on perimeter fencing heights or configurations beyond existing Municipal Code requirements. The commenter's specific recommendations regarding fencing restrictions and height limitations would be design considerations for the City to evaluate during the project review and approval process.

Traffic safety concerns related to sight lines would also be reviewed by the City's traffic engineering staff as part of standard development review procedures. These suggestions will be forwarded to the appropriate City departments for consideration during the permit review process. No further response or action is required under CEQA.

COMMENT LETTER NO. 6

From: Jean Pfaffinger
Sent: Thursday, December 4, 2025 12:37 PM
To: Joshua Wolf <ewolf@sierramadeca.gov>
Subject: [EXTERNAL] Ginkgo Stonehouse development on Grandview and impact 891 E. Grandview

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Dear Mr. Wolf,

Thank you for speaking with me today about the Environment Impact Report for the Ginkgo Stonehouse Project which is next door to my home at 891 E Grandview Ave, Sierra Madre, CA 91024.

As I pointed out to you, the report appears to disregard the existence of my 100+ year old carriage house situated on the property line to the west of the proposed project. The carriage house is plainly visible from the street and I believe from the ground level next door but it is not referenced or included in the report. The aerial photos in the report that include my property have managed to select just the "right" perspective to show only trees and not the carriage house or my deck/carport which spans my driveway north of the carriage house. Maybe this is inadvertent, but it is important missing information.

6-1

Both of these structures (carriage house and deck) were included in architectural plans submitted to the City for the addition built on my property in 2008-2009. I believe both also show in the County Public works records. As mentioned, they are also clearly visible from the street, so there is really no good excuse for them to be missing.

Besides issues related to necessary clearances between my structures and any new structures built next door, there are issues related to grading between the properties and how my buildings will be impacted by any grade changes. As is, the soil level to the east of my carriage house is 1-2 feet higher than it was in 2007 when we bought our home. Past heavy rains, vegetation decay and soil erosion next door have likely caused the

6-2

build up and now the level of property next door is about 3-4 feet higher than my driveway and the floor of the carriage house.

6-2

Also the proposed location of lots 3 and 4 (or the revised proposal's lots 4 and 5) are of serious concern to me. Those lots abut and tower over an undeveloped but flat and peaceful part of my lot and impact, not only my privacy with structures looking down on it from above, but also create fire hazards impacting my property. When I purchased my home in 2007, the Hillside Development District was already in place and required 2+ acre lots, building to the terrain contours and protecting wild species. Allowing a project of this scope to go forward basically means I will have 8-9 neighbors in close proximity when at most I should only have had 1 or 2.

6-3

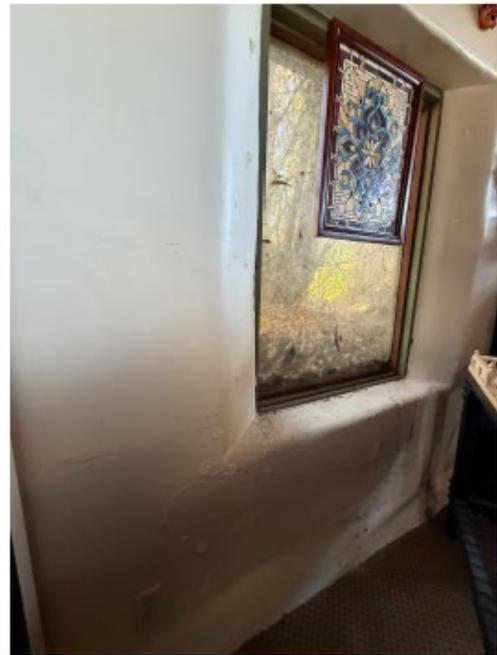
Frankly, I am surprised that no one has tried to walk my property to get an accurate view of how these proposed plans substantially impact the adjoining property.

6-4

I have included photos of my carriage house with views from the street and also the north facing side, the carriage house interior with soil level outside the window and my carport/deck which is north of the carriage house.

Thanks for your consideration. Feel free to contact me with any questions.
Jean Pfaffinger

6-5



6-5



Response No. 6

Jean Pfaffinger
Resident
December 4, 2025

Comment 6-1: The commenter thanks the City for discussing the Project’s Environmental Impact Report (EIR) and identifies their property as being immediately west of the Project site.

Response: The commenter acknowledges having discussed the Project’s EIR with City staff and identifies the location of their property. No further response or action is required under CEQA.

Comment 6-2: The commenter states that the EIR appears to disregard the existence of a 100+ year old carriage house situated on the property line to the west of the proposed Project and states that the carriage house is plainly visible from the street and possibly from the ground level next door but that it is not referenced or included in the report. The comment states that aerial photos in the report have managed to select just the “right” perspective to show only trees and not the carriage house or associated deck/carport, which spans the driveway north of the carriage house. The commenter acknowledges that this omission may have been inadvertent, but states that it is important missing information.

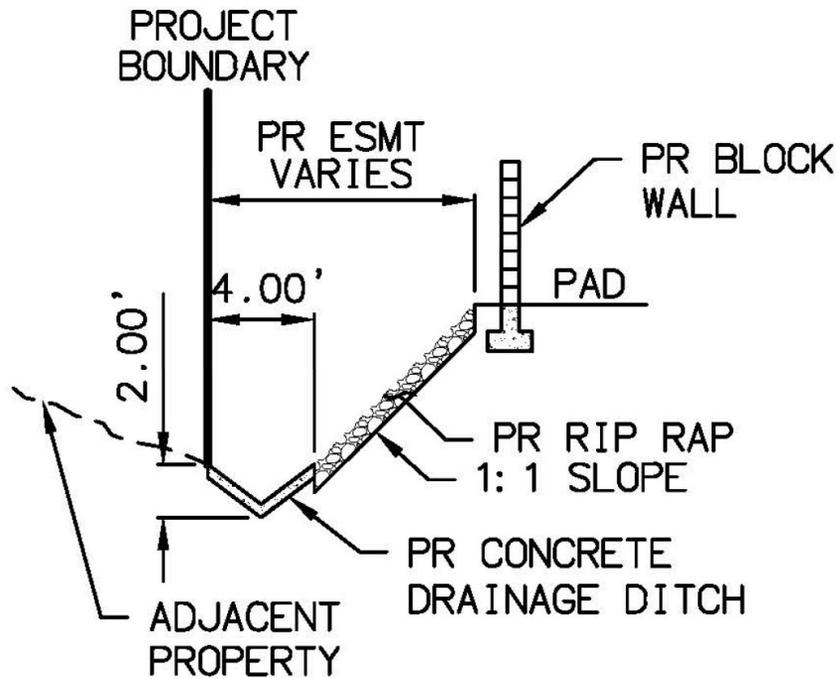
Response: In response to the comment, the City has reviewed historic aerials, street views, and City building records to confirm the location of the “carriage house”, which according to City building records, identify the carriage house structure as a “shed”. The City has directed the Project Applicant to revise the Tentative Tract Map (TTM) to include the structure on the underlying topographic map layer that represents existing conditions. The City has also reviewed the Draft EIR for any sections where additional analysis may be required to address the existence and location of this offsite adjacent structure. As a result of this review, additional analysis has been added to this Final EIR and to the revised Draft EIR Section 5.13.5 regarding temporary construction noise and vibration, as further discussed below under response to Comment 6-4. No further response or action is required under CEQA.

Comment 6-3: The commenter states that both of these structures (carriage house and deck) were included in architectural plans submitted to the City for the addition built on the property in 2008-2009 and believes both also show in the County Public Works records. The commenter restates they are also clearly visible from the street, so there is really no good excuse for them to be missing.

Response: See response to Comment 6-2. The City has verified that the building records indicate the structure is listed as a “shed” and this Final EIR and the Revised Draft EIR have been revised as described under response to Comment 6-4. No further response or action is required under CEQA.

Comment 6-4: The commenter states concern regarding issues related to necessary clearances between their existing structures and any proposed structures on the Project site as well as concerns regarding issues related to grading between the properties and how existing buildings will be impacted by any grade changes. The commenter notes that the existing soil level to the east of the carriage house (shed) is 1-2 feet higher than it was in 2007 when the property was purchased. The commenter indicates that past heavy rains, vegetation decay and soil erosion on the Project site have likely caused the buildup of soils and vegetation decay on the Project site, which is now estimated at about 3-4 feet higher than their existing driveway and the floor of the carriage house.

Response: The Draft EIR included an abbreviated version of the Tentative Tract Map (TTM) in Figure 3-4 as the “detailed map”, which is required under CEQA Guidelines Section 15124, Project Description, part (a). The full TTM includes a cross-section “A-A”, which details how grading and drainage would be handled along the western edge of the Project site, which is the property line in question regarding the carriage house. As shown below, cross-section A-A shows the property line would be modified to include an adjacent 2-foot deep by 4-foot-wide concrete v-ditch followed by a riprap (rock) slope and concrete block wall. The proposed modified property line would remove the existing sediment and vegetation decay buildup and manage future stormwater flows and sediment transport in the long-term. Cross-section A-A is depicted as follows:



SECTION A-A
SCALE: NTS

The City has reviewed the Draft EIR and determined that the findings and conclusions made in Section 5.7, *Geology and Soils*, and Section 5.10, *Hydrology and Water Quality*, remain valid and do not require revisions. No further response or action is required under CEQA.

Regarding temporary construction impacts associated with grading, the Draft EIR Section 5.13.5 under the heading *Impact NOI-2* has been revised to include discussion of the adjacent offsite carriage house (shed) and potential impacts associated with heavy equipment use and vibration during grading and construction. The revised analysis is supported by the *Ginkgo Stonehouse Residential Project Noise Impact Study, City of Sierra Madre – Supplemental Memorandum* prepared by RK Engineering Group, Inc. and dated December 4, 2025, which is now included as Appendix H2 of the revised Draft EIR. The analysis determined that potential impacts associated with heavy equipment use near the property line would be less than significant with Mitigation Measure NOI-1 incorporated. The revisions are discussed in detail within the Errata section of this FEIR and the Mitigation Measure NOI-1 is shown below.

NOI-1 No large bulldozers, loaded trucks, or other heavy vibratory-inducing equipment shall be operated within 10 feet of an offsite structure existing at the time of preparation of the Project's EIR, including the carriage house (shed) located immediately west of the Project site. Prior to issuing a grading permit, the City's Planning and Community Preservation Department or Building and Safety Division shall verify that the grading plans identify any offsite structure and the minimum 10-foot buffer. The minimum 10-foot buffer shall be marked in the field and discussed with the grading contractor and equipment operators during a pre-grading field meeting.

No further response or action is required under CEQA.

Comment 6-5: The commenter states that the proposed location of Lots 3 and 4 (or the revised proposal's Lots 4 and 5) are of serious concern to the commenter. They state that the lots abut and tower over an undeveloped but flat and peaceful part of their lot and impact, not only their privacy with structures looking down on it from above, but also create fire hazards impacting their property. They state that when they purchased their property in 2007, the Hillside Development District was already in place and required 2+ acre lots, building to the terrain contours and protecting wild species. They state that allowing a project of this scope to go forward basically means they will have 8-9 neighbors in close proximity when at most they should only have had 1 or 2.

Response: The commenter's concern regarding privacy is acknowledged; however, impacts to privacy and private views are not considered potential environmental impacts under CEQA. Therefore, no further response or action is required under CEQA.

The proposed Project's potential for creating additional fire hazards is analyzed and disclosed in Section 5.9.5, *Hazards and Hazardous Materials*, under *Impact HAZ-7* and in Section 5.20.5, *Wildfires*. Potential impacts were determined to be less than significant with implementation of standard conditions and City oversight review procedures. The commenter does not raise any new or specific issues about the nature of fire hazards or how the proposed Project would increase potential fire risks to their property. Upon further evaluation, it is anticipated that fire risk to the adjacent property may decrease with Project implementation as a result of vegetation clearing and management and use of higher-level ignition resistant construction practices. No further response or action is required under CEQA.

As stated in Section 3.0, *Project Description*, under the heading *Planning Programs (Land Use And Zoning)* and in Section 5.11, *Land Use and Planning Section*, the proposed Project's development parameters are governed by the *Settlement Agreement and Mutual Release* (Settlement Agreement) between CS Stonehouse, LLC, CS One Carter LLC, and the City of Sierra Madre, executed and formally approved by the Sierra Madre City Council in March 2010 following public review and approval procedures. The Settlement Agreement establishes specific development rights and entitlements for the Project site, modifying the application of certain provisions of the City's zoning regulations. A subsequent *Memorandum of Understanding* (MOU) between Ginkgo Stonehouse, LLC, and Ginkgo Stonehouse II, LLC was executed in December 2012, which allowed for the construction of no less than 10 buildable lots on the Project site (referred to in the MOU as the Ginkgo Property). The Project's proposed lots comply with the density policies of the City's General Plan (one dwelling unit per approximately one acre) and with the applicable development standards as modified by the Settlement Agreement. The Settlement Agreement in this case represents a negotiated resolution of prior litigation between the City and the prior property owners, balancing the City's regulatory interests with the property owner's vested development expectations. The Settlement Agreement's provisions regarding lot sizes, density, and development standards were publicly reviewed and approved, and have been incorporated into the Project design to ensure compliance with all applicable land use entitlements. Thus, the Project's consistency with land use regulations must be

assessed based on the standards established by the Settlement Agreement, rather than the default requirements of the current Hillside Management Zone ordinance. No further response or action is required under CEQA.

As discussed in Table 5.11-3, *General Plan Consistency Analysis*, the proposed Project was determined to be consistent with “Objective L15: Preserving the hillside through the application of standards and guidelines that direct and encourage development that is sensitive to the unique characteristics of the hillsides, which include, but are not limited to, slopes, land forms, vegetation, wildlife habitat and scenic quality; accordingly, innovation in the design of buildings and structures is encouraged in order to preserve hillside areas.” The Project proposes to preserve the hillside with minimal grading by concentrating housing closer to East Grand View Avenue. This would preserve slopes, land forms, vegetation, wildlife habitat and scenic quality. No further response or action is required under CEQA.

Comment 6-6: The commenter states that they are surprised no one has tried to walk their property to get an accurate view of how the Project’s proposed plans substantially impact the adjoining property.

Response: Surveys of offsite properties adjacent to a proposed Project site are not required under CEQA and are often completed through visual observation from the Project site itself due to access constraints and to avoid trespass. In terms of how the proposed Project may “substantially impact the adjoining property”, such concerns have been addressed under responses to Comments 6-2 through 6-5. No further response or action is required under CEQA.

Comment 6-7: The commenter includes a description of the carriage house with pictures and thanks the City for considering their comments.

Response: The City has incorporated the provided photographs as part of the review in this responses to comments section. No further response or action is required under CEQA.

SECTION 3.0 ERRATA

3.1 INTRODUCTION

This section contains revisions to the Draft Environmental Impact Report (DEIR) based upon the following:

- Additional or revised information required to prepare a response to a specific comment;
- Applicable updated information that was not available at the time of the DEIR publication; and/or
- Typographical errors.

This section also includes additional mitigation measures to fully respond to the commenters' concerns as well as provide additional clarification to mitigation requirements included in the DEIR. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the DEIR.

3.2 REVISIONS TO THE DEIR

Changes to the DEIR are noted below. A double-underline indicates additions to the text; ~~strikethrough~~ indicates deletions to the text. Changes have been analyzed and responded to in Section 2.0, *Response to Comments*, of the FEIR. The changes to the DEIR do not affect the overall conclusions of the environmental document. Changes are listed by page and, where appropriate, by paragraph. All mitigation measure modifications have been reflected in Section 4.0, *Mitigation Monitoring and Reporting Program*, of the FEIR.

SECTION 1.0 EXECUTIVE SUMMARY

Section 1.1, *Introduction*, has been revised to include mention of the Noise Supplemental Memo prepared December 4, 2025 as follows:

Data for this DEIR was derived from onsite field observations, discussions with affected agencies, analysis of adopted plans and policies, review of available studies, reports, data and similar literature, and specialized environmental assessments (Air Quality, Greenhouse Gas, and Energy Impact Study; Biological Technical Report; Phase 1 Cultural Resources Assessment; Historical Evaluation Memorandum for the Record; Geologic and Soils Engineering Plan Review and Update Report; Geologic and Soils Engineering Exploration Update; Phase I Environmental Site Assessment; Drainage Study; Preliminary Low Impact Development (LID) Plan; Noise Impact Study and Supplemental Memorandum; Public Service/Utility Correspondence; Water Study; and Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis). These supporting documents and technical studies are found in Appendices B through J.

The mitigation measures under Section 1.5, *Environmental Issues/Mitigation Summary*, have been revised in the table as follows:

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
5.4	Biological Resources		
	Impact BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the	BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources. The following measures shall be implemented prior to and during construction as follows: a) Within 3 days prior to the start of vegetation removal and/or ground disturbing activities	Less Than Significant Impact With Mitigation Incorporated

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
	California Department of Fish and Game or U.S. Fish and Wildlife Service?	<p>(i.e., grading/excavations), a preconstruction biological resources clearance survey shall be conducted by the Project Biologist. The Biologist shall look for special status plant and animal species with in at least a moderate or higher potential to colonize the Project site. If a special status species is identified, it shall be avoided using temporary no-work buffers until the individual leaves on its own or is relocated pursuant to applicable regulations. <u>Buffers for CEQA and/or FESA species shall be demarcated by the qualified biologist in coordination with CDFW and/or USFWS.</u> CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as applicable to the identified species, and any permits needed for take of the species shall be obtained. Results of the survey shall be provided to the City.</p> <p>b) Prior to vegetation removal and/or ground disturbing activities (i.e., grading/excavations), the Biologist shall clearly delineate the limits of disturbance to avoid unplanned impacts within the non-buildable area.</p> <p>c) The Project Biologist shall conduct a worker education program at a pre-construction meeting that includes identification, avoidance and reporting procedures regarding nesting birds, bat maternity colonies, and special status plants and animals with a moderate or higher chance to occur on the Project site.</p> <p>d) <u>If any CEQA or FESA protected wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.</u></p> <p>BIO-2: Tree Replacement and Preservation Plan. Prior to vegetation removal or ground disturbance activities, the Project Applicant/Developer shall retain a certified arborist to prepare and submit a</p>	

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		<p>Tree Replacement and Preservation Plan for review and approval by the City; and shall obtain all required permits/approvals consistent with the requirements of Sierra Madre Municipal Code, Chapter 12.20, <i>Tree Preservation and Protection</i> and the hillside-specific requirements under Chapter 17.52 <i>Hillside Management Zone</i>, including Sections 17.52.100(A)(4) (Flood Plan Requirements), 17.52.100(C)(6) (Vegetation Mapping Requirements), 17.52.100(C)(8) (Suitability Analysis Requirements), and 17.52.180 (Biotic Resources Management Plan Requirements). The final plan shall be based on recommended mitigation measures, tree protection measures, and measures for the removal of polyphagous shot hole borer trees as detailed in the <i>Stonehouse Project Arborist Report</i> dated March 2016. The Tree Replacement and Preservation Plan shall address replacement ratio and species requirements, tree relocation feasibility, tree protection measures, and monitoring of post-planting success. Should it be determined that there is inadequate available planting space to accommodate the required replacement trees, the City shall require planting native trees or related species approved by the director on public property identified by the City, and/or payment of an in-lieu fee to the City's tree replacement fund.</p>	
	<p>Impact BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p>	<p>Mitigation Measures BIO-1 and BIO-2 are required.</p>	<p>Less Than Significant Impact With Mitigation Incorporated</p>
	<p>Impact BIO-3: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	<p>No mitigation measures are required.</p>	<p>No Impact</p>
	<p>Impact BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>	<p>Mitigation Measure BIO-1 is required.</p> <p>BIO-3: Nesting Bird Season Restrictions and Pre-Construction Surveys. The clearance of vegetation construction shall occur outside of the nesting bird season (nesting bird season defined herein as February 1 through September 15), if feasible. If vegetation removal and/or demolition outside this time period is not feasible, the following additional measures shall be employed to avoid impacts to nesting birds protected under the MBTA and CFGC.</p> <p>A pre-construction nesting bird survey shall be conducted by a qualified biologist (i.e., a biologist familiar and experienced with the identification</p>	<p>Less Than Significant Impact With Mitigation Incorporated</p>

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		<p>and life histories of wildlife and plant species in southern California) within 3 days (72 hours) prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. Nests found shall be recorded.</p> <p>If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, a qualified biologist shall monitor the nest on a bi-weekly (twice a week) basis, or at a frequency necessary to determine potential project impacts, and the construction activity shall be postponed within the buffer until the biologist determines that the nest is no longer active.</p> <p>If the recommended nest avoidance buffer zone is not feasible, the qualified biologist shall provide justification on a case-by-case basis if a buffer reduction is possible, taking into consideration the location of work and type of activity, distance of nest from work area, surrounding vegetation, and line-of-sight between the nest and work areas, tolerance of species to disturbance, and observations of the nesting bird's reaction to construction activities (including light, noise, dust, and human presence).</p> <p>If the biologist determines nesting activities may fail as a result of work activities, work activities shall be modified or shall temporarily cease (except access along established roadways) within the recommended no disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site.</p> <p>Buffers shall be delineated (by or under the supervision of a qualified biologist) onsite with bright flagging, for easy identification by staff and the construction team. The perimeter of the buffer (300 feet to 500 feet depending on the species) shall be flagged so as not to draw predator attention to the direct location of the nest itself and flagging will be minimized where feasible. The onsite construction supervisor and operator staff shall be notified of the nest and the buffer limits to ensure it is maintained.</p> <p>A summary of preconstruction surveys, monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season and submitted to the City.</p> <p>BIO-4a: Pre-Construction Roosting Bat Survey. Prior to vegetation removal occurring between April 1 and August 31, <u>the Project proponent shall retain a qualified Biologist (i.e., familiar with bat</u></p>	

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		<p><u>species and with conducting bat surveys) to conduct at least one daytime and one nighttime bat survey throughout the Project site (plus a 100-foot buffer as access allows) a pre-construction bat roost survey shall be conducted to check for signs of active bat use, including guano, urine staining, and bat vocalizations (detected using ultrasonic acoustic equipment). Additional surveys may also be conducted, as recommended by the qualified Biologist, if the initial survey results are inconclusive. A discussion of survey results, including negative findings, shall be provided to the City and, if active maternity roosts are identified, to the California Department of Fish and Wildlife (CDFW). If active maternity roosts are identified, the Project proponent and qualified Biologist shall consult with and receive written concurrence from the California Department of Fish and Wildlife (CDFW) to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat maternity colonies based on CDFW recommendations. No project activities shall occur within the established buffer area until a qualified Biologist verifies the maternity roost is no longer in use.</u></p> <p>If construction activities begin outside the bat maternity season (September 1 through March 31), a qualified Biologist shall conduct <u>a at least one</u> pre-construction survey no more than 14 days prior to vegetation removal to determine if bats are <u>day-roosting</u> in the project area. If <u>day-roosting</u> bats are detected, consultation with CDFW shall occur prior to vegetation removal to determine appropriate exclusion methods and timing restrictions. Any identified <u>day-roost</u> sites shall be monitored by a qualified Biologist to ensure bats have vacated the roost prior to the start of construction activities. <u>No project activities shall occur within the established buffer area until a qualified Biologist verifies the day-roost can be humanely evicted/excluded.</u> If no roosting bats are detected during the pre-construction survey, vegetation removal may proceed without restriction.</p> <p>BIO-4b: Tree Removal. <u>To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If the qualified Biologist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw where the terrain and site conditions allow to be done safely.</u></p>	

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		<p><u>To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a qualified Biologist. Trees that are known to be a bat roost shall not be bucked or mulched immediately. A period of at least 24-48 hours, as determined by the qualified Biologist, shall elapse prior to such operations to allow bats to escape.</u></p> <p>BIO-4c: <u>Bat Roost Compensatory Mitigation. If the Project impacts occupied maternity bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified Biologist. The qualified Biologist shall prepare a management plan for the bat roost structures for CDFW to review and approve. If CDFW does not respond within 30 days, the plan shall be considered approved. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.</u></p>	
	<p>Impact BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</p>	<p>Mitigation Measure BIO-2 is required.</p>	<p>Less Than Significant Impact With Mitigation Incorporated</p>
	<p>Impact BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</p>	<p>No mitigation measures are required.</p>	<p>No Impact</p>
<p>5.13</p>	<p>Noise</p> <p>Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</p> <p>Impact NOI-2: Would the project result in generation of excessive ground borne vibration or ground borne noise levels?</p>	<p>No mitigation measures are required.</p> <p>NOI-1: <u>No large bulldozers, loaded trucks, or other heavy vibratory-inducing equipment shall be operated within 10 feet of an offsite structure existing at the time of preparation of the Project's EIR, including the carriage house (shed) located immediately west of the Project site. Prior to issuing a grading permit, the City's Planning and Community Preservation Department or Building</u></p>	<p>Less Than Significant Impact</p> <p>Less Than Significant Impact With Mitigation Incorporated</p>

EIR Section	Impact Statement	Mitigation Measure	Significance After Mitigation
		<u>and Safety Division shall verify that the grading plans identify any offsite structure and the minimum 10-foot buffer. The minimum 10-foot buffer shall be marked in the field and discussed with the grading contractor and equipment operators during a pre-grading field meeting. No mitigation measures are required.</u>	
	Impact NOI-3: For a project located within the vicinity of a private airstrip of an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No mitigation measures are required.	No Impact

Section 1.6, *Summary of Project Alternatives*, page 1-21 of the DEIR is amended as follows:

Table 1-1
Project Alternatives Impact Comparison Summary

Environmental Issue Area	Proposed Project Impact Finding	Alternative 1: No Project, Current General Plan and Zoning	Alternative 2: Reduced Lot Size Design Alternative
Aesthetics	Less than Significant Impact	Similar	Similar
Agriculture/Forestry Resources	No Impact	Similar	Similar
Air Quality	Less than Significant Impact	Lesser	Lesser
Biological Resources	Less than Significant with Mitigation Incorporated	Lesser	Lesser
Cultural Resources	Less than Significant with Mitigation Incorporated	Lesser	Similar
Energy	Less than Significant Impact	Lesser	Lesser
Geology/Soils	Less than Significant with Mitigation Incorporated	Similar	Similar
Greenhouse Gas Emissions	Less than Significant Impact	Lesser	Lesser
Hazards/Hazardous Materials	Less than Significant with Mitigation Incorporated	Lesser	Similar
Hydrology/Water Quality	Less than Significant Impact	Lesser	Similar
Land Use and Planning	Less than Significant Impact	Similar	Similar
Mineral Resources	No Impact	Similar	Similar
Noise	Less than Significant Impact <u>with Mitigation Incorporated</u>	Lesser	Lesser
Population/Housing	Less than Significant Impact	Lesser	Similar
Public Services	Less than Significant Impact	Lesser	Similar

Environmental Issue Area	Proposed Project Impact Finding	Alternative 1: No Project, Current General Plan and Zoning	Alternative 2: Reduced Lot Size Design Alternative
Recreation	Less than Significant Impact	Lesser	Similar
Transportation	Less than Significant Impact	Lesser	Similar
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	Lesser	Similar
Utilities/Service Systems	Less than Significant Impact	Lesser	Similar
Wildfire	Less than Significant with Mitigation Incorporated	Similar	Similar

SECTION 2.0 INTRODUCTION

Section 2.7, *Technical Studies Prepared for the Proposed Project*, on page 2-6 of the DEIR is amended as follows:

- Noise Supplemental Memorandum [RK Engineering Group, Inc. | December 4, 2025]

SECTION 5.4 BIOLOGICAL RESOURCES

Section 5.4.7, *Mitigation Measures*, beginning on page 5.5-28 of the DEIR is amended as follows:

BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources. The following measures shall be implemented prior to and during construction as follows:

- Within 3 days prior to the start of vegetation removal and/or ground disturbing activities (i.e., grading/excavations), a preconstruction biological resources clearance survey shall be conducted by the Project Biologist. The Biologist shall look for special status plant and animal species within ~~at least a moderate or higher potential to colonize~~ the Project site. If a special status species is identified, it shall be avoided using temporary no-work buffers until the individual leaves on its own or is relocated pursuant to applicable regulations. Buffers for CEQA and/or FESA species shall be demarcated by the qualified biologist in coordination with CDFW and/or USFWS. CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as applicable to the identified species, and any permits needed for take of the species shall be obtained. Results of the survey shall be provided to the City.
- Prior to vegetation removal and/or ground disturbing activities (i.e., grading/excavations), the Biologist shall clearly delineate the limits of disturbance to avoid unplanned impacts within the non-buildable area.
- The Project Biologist shall conduct a worker education program at a pre-construction meeting that includes identification, avoidance and reporting procedures regarding nesting birds, bat maternity colonies, and special status plants and animals with a moderate or higher chance to occur on the Project site.
- If any CEQA or FESA protected wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented

immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

BIO-4a: Pre-Construction Roosting Bat Survey. Pre-Construction Roosting Bat Survey. Prior to vegetation removal occurring between April 1 and August 31, the Project proponent shall retain a qualified Biologist (i.e., familiar with bat species and with conducting bat surveys) to conduct at least one daytime and one nighttime bat survey throughout the Project site (plus a 100-foot buffer as access allows) a pre-construction bat roost survey shall be conducted to check for signs of active bat use, including guano, urine staining, and bat vocalizations (detected using ultrasonic acoustic equipment). Additional surveys may also be conducted, as recommended by the qualified Biologist, if the initial survey results are inconclusive. A discussion of survey results, including negative findings, shall be provided to the City and, if active maternity roosts are identified, to the California Department of Fish and Wildlife (CDFW). If active maternity roosts are identified, the Project proponent and qualified Biologist shall consult with and receive written concurrence from the California Department of Fish and Wildlife (CDFW) to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat maternity colonies based on CDFW recommendations. No project activities shall occur within the established buffer area until a qualified Biologist verifies the maternity roost is no longer in use.

If construction activities begin outside the bat maternity season (September 1 through March 31), a qualified Biologist shall conduct a at least one pre-construction survey no more than 14 days prior to vegetation removal to determine if bats are day-roosting in the project area. If day-roosting bats are detected, consultation with CDFW shall occur prior to vegetation removal to determine appropriate exclusion methods and timing restrictions. Any identified day-roost sites shall be monitored by a qualified Biologist to ensure bats have vacated the roost prior to the start of construction activities. No project activities shall occur within the established buffer area until a qualified Biologist verifies the day-roost can be humanely evicted/excluded. If no roosting bats are detected during the pre-construction survey, vegetation removal may proceed without restriction.

BIO-4b: Tree Removal. To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If the qualified Biologist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw where the terrain and site conditions allow to be done safely. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a qualified Biologist. Trees that are known to be a bat roost shall not be bucked or mulched immediately. A period of at least 24-48 hours, as determined by the qualified Biologist, shall elapse prior to such operations to allow bats to escape.

BIO-4c: Bat Roost Compensatory Mitigation. If the Project impacts occupied maternity bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall

provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified Biologist. The qualified Biologist shall prepare a management plan for the bat roost structures for CDFW to review and approve. If CDFW does not respond within 30 days, the plan shall be considered approved. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.

SECTION 5.13 NOISE

Section 5.13.1, *Introduction*, page 5.13-1 of the DEIR is amended as follows:

This section analyzes the proposed Project’s potential noise and vibration impacts. The analysis in this section is based in part on the following technical reports:

- *Ginkgo Stonehouse Residential Noise Impact Study*, RK Engineering Group, Inc., March 6, 2024 (Appendix H1). This report is herein referred to as the “Noise Impact Study” in this section.
- *Ginkgo Stonehouse Residential Project Noise Impact Study, City of Sierra Madre – Supplemental Memorandum*, RK Engineering Group, Inc., December 4, 2025 (Appendix H2). This report is herein referred to as the “Supplemental Memorandum” in this section.

Section 5.13.5, *Environmental Impact Analysis*, under Impact NOI-2, beginning on page 5.13-13 of the DEIR is amended as follows:

To determine the vibratory impacts during construction, reference construction equipment vibration levels were utilized and then extrapolated to the façade of the nearest adjacent structures. There are several noise sensitive receptors adjacent to the proposed Project site, including:

- **Western Receptors.** Existing residential land uses located along the western boundary of the Project site, approximately 30 feet north of the centerline of East Grand View Avenue. The closest structure is a carriage house (identified as a “shed” according to City building records), presumed to have been constructed in the early 1900s, located immediately west of the Project Site.
- **Southern Receptors.** Existing residential land uses located approximately 48 feet south of the Project site’s southern boundary, approximately 23 feet south of the centerline of East Grand View Avenue.
- **Eastern Receptors.** Existing residential land uses located along the eastern boundary of the Project site, approximately 22 feet north of the centerline of East Grand Avenue.

Project construction would not involve the use of substantial vibration inducing equipment or activities, such as pile drivers. In addition, no historical or fragile buildings are known to be located within the Project vicinity, which may be more susceptible to potential damage from vibration; however, a carriage house (shed) located immediately west of the Project site property line is considered to be an older building so the “historic and some old buildings” vibration threshold within the *Caltrans Transportation and Construction Induced Vibration Guidance Manual* (see Table 5.13-6) is applicable.

The main sources of vibration impact during Project construction would be the operation of larger equipment such as bulldozer activity during demolition, loading trucks during grading and excavation, and vibratory rollers during paving. As a condition of approval, such large equipment would not be permitted to operate within a minimum distance of 10 feet from any existing structures, including the carriage house (shed) located immediately west of the Project site. The demolition stage (20 days), grading stage (20 days),

and paving stage (20 days) are collectively estimated to last a total of 60 working days. The remaining construction duration is not expected to generate notable levels of vibration.

The construction vibration assessment utilized the referenced vibration levels as shown in Table 5.13-7, Construction Vibration Impact Analysis. As shown in Table 5.13-7, calculated vibration levels compared to the criteria shown in Table 5.13-5 and Table 5.13-6 would result in instances of strongly distinctly perceptible vibration for occupants, if occupying the nearest structure (i.e., carriage house (shed)), but no potential for building damage.

Table 5.13-7
Construction Vibration Impact Analysis

Construction Activity	Distance to Nearest Structure (ft)	Calculated Vibration Level - PPV (in/sec)	Annoyance Potential	Damage Potential
Vibratory Roller	129 158	0.0350 0.028	Barely Perceptible	None
Large Bulldozer	1040	0.2440-0.053	Strongly Distinctly Perceptible	None
Loaded Trucks	1040	0.2080-0.045	Strongly Distinctly Perceptible	None

Source: RK Engineering Group, Inc., *Noise Impact Study*, March 6, 2024 and *Supplemental Memorandum*, December 4, 2025.

As discussed above, there is no potential for damage to existing buildings or structures based on the impact analysis. There is a potential for occupants of the closest buildings to experience occurrences of distinctly to strongly perceptible vibration. ~~Neither strongly perceptible nor~~ No severely perceptible vibration occurrences are anticipated and strongly perceptible vibration is only anticipated at the nearest structure (i.e., carriage house (shed)). In addition, strongly and distinctly perceptible vibration levels would be short-term and transient for a particular receptor as the construction equipment moves from one location to another on the Project site. Project construction would also be restricted to the City’s permitted daytime hours pursuant to the Municipal Code. Based on the analysis above, potential impacts are considered less than significant with the implementation of Mitigation Measure NOI-1, which would ensure large vibratory-inducing equipment is not used within 10 feet of an existing offsite structure and no mitigation is required.

LONG-TERM OPERATIONAL IMPACTS

Project operations would consist of residential occupancy and residential uses, which would not involve the operation of daily equipment (e.g., industrial/commercial machinery) associated with long-term adverse vibration impacts. No potential vibration impacts are anticipated, and no mitigation is required.

Level of Impact Before Mitigation: Potentially significant temporary vibration impact during construction if large bulldozers or truck loading occurs within 10 feet of an adjacent offsite structure. Less than significant ~~No~~ noise impact during temporary construction activities and during long-term operations based on the vibration screening results.

Mitigation Measures: Mitigation Measure NOI-1 described in Section 5.13.7 would be required ~~No~~ mitigation measures are required.

Level of Impact After Mitigation: Less Than Significant Impact ~~With Mitigation Incorporated~~.

Section 5.13.7, *Mitigation Measures*, page 5.13-15 of the DEIR is amended as follows:

NOI-1 No large bulldozers, loaded trucks, or other heavy vibratory-inducing equipment shall be operated within 10 feet of an offsite structure existing at the time of preparation of the Project’s EIR, including the carriage house (shed) located immediately west of the Project site.

Prior to issuing a grading permit, the City's Planning and Community Preservation Department or Building and Safety Division shall verify that the grading plans identify any offsite structure and the minimum 10-foot buffer. The minimum 10-foot buffer shall be marked in the field and discussed with the grading contractor and equipment operators during a pre-grading field meeting.

Section 5.13.8, *References*, page 5.13-15 of the DEIR is amended as follows:

RK Engineering Group, Inc. *Ginkgo Stonehouse Residential Project Noise Impact Study, City of Sierra Madre – Supplemental Memorandum*. December 5, 2025.

SECTION 6.0 ALTERNATIVES ANALYSIS

Section 6.8, *Alternative 1: No Project, Current General Plan and Zoning*, under 6.8.13, *Noise*, page 6-8 of the DEIR is amended as follows:

Alternative 1 does not propose the construction or occupancy of any new residential units. Site preparation, grading operations, and construction would not occur under Alternative 1; therefore, construction-related temporary noise would not occur under Alternative 1. Operational noise from resident vehicles and occupied single-family homes would also be lower under Alternative 1 due to fewer residential homes. No mitigation would be required for ~~the proposed Project or Alternative 1~~ compared to the proposed Project, which would require Mitigation Measure NOI-1 to reduce potential temporary vibration impacts on existing offsite structures by maintaining at least a 10-foot exclusion zone for the operation of large and vibratory-inducing construction equipment. Impacts would ~~also~~ be less than significant with mitigation for the proposed Project and no impacts would occur under Alternative 1.

Section 6.9, *Alternative 2: Reduced Lot Size Design Alternative*, under 6.9.13, *Noise*, page 6-14 of the DEIR is amended as follows:

Alternative 2 proposes the construction and occupancy of the same number of residential units as the proposed Project. Site preparation and grading operations would be slightly reduced under Alternative 2 due to the reduced grading footprint; however, building construction-related noise would be substantially the same. Operational noise from resident vehicles and occupied single-family homes would also be substantially the same as the proposed Project. ~~No mitigation would~~ Mitigation Measure NOI-1 would be required for the proposed Project ~~and~~ Alternative 2. Impacts would also be less than significant with mitigation incorporated.

Section 6.10, *Summary of Project Alternatives Impacts*, page 6-18 of the DEIR is amended as follows:

Table 6-1
Project Alternatives Impact Comparison Summary

Environmental Issue Area	Proposed Project Impact Finding	Alternative 1: No Project, Current General Plan and Zoning	Alternative 2: Reduced Lot Size Design Alternative
Aesthetics	Less than Significant Impact	Similar	Similar
Agriculture/Forestry Resources	No Impact	Similar	Similar
Air Quality	Less than Significant Impact	Lesser	Lesser
Biological Resources	Less than Significant with Mitigation Incorporated	Lesser	Lesser
Cultural Resources	Less than Significant with Mitigation Incorporated	Lesser	Similar
Energy	Less than Significant Impact	Lesser	Lesser
Geology/Soils	Less than Significant with Mitigation Incorporated	Similar	Similar
Greenhouse Gas Emissions	Less than Significant Impact	Lesser	Lesser
Hazards/Hazardous Materials	Less than Significant with Mitigation Incorporated	Lesser	Similar
Hydrology/Water Quality	Less than Significant Impact	Lesser	Similar
Land Use and Planning	Less than Significant Impact	Similar	Similar
Mineral Resources	No Impact	Similar	Similar
Noise	Less than Significant Impact <u>with Mitigation Incorporated</u>	Lesser	Lesser
Population/Housing	Less than Significant Impact	Lesser	Similar
Public Services	Less than Significant Impact	Lesser	Similar
Recreation	Less than Significant Impact	Lesser	Similar
Transportation	Less than Significant Impact	Lesser	Similar
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	Lesser	Similar
Utilities/Service Systems	Less than Significant Impact	Lesser	Similar
Wildfire	Less than Significant with Mitigation Incorporated	Similar	Similar

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SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

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

In compliance with Public Resources Code Section 21081.6, [Table 4-1, *Mitigation Monitoring and Reporting Checklist*](#), has been prepared for the Ginkgo Stonehouse Residential Project (Project). This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable mitigation measures relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the City of Sierra Madre Ginkgo Stonehouse Residential Project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist ([Table 4-1](#)). If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

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

- The City distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the EIR, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the City as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
- Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.
- The City prepares a reporting form periodically during the construction phase and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures will be included in construction documents and/or conditions of permits/approvals.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. No change will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.6.

The following subsections of the DEIR contain a detailed environmental analysis of the existing conditions, project impacts (including direct and indirect, short-term, long-term, and cumulative impacts), recommended mitigation measures, and significant unavoidable impacts, if any.

Based on the DEIR, no significant impacts would occur in regard to the following environmental issue areas, which are addressed in the Draft EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

In accordance with Appendix G of the *CEQA Guidelines*, the following environmental issue areas were determined in the DEIR to have a potentially significant impact:

- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Noise
- Tribal Cultural Resources

For the purposes of the environmental analysis in the DEIR, impacts were analyzed in each environmental issue area for the proposed Project. If a potentially significant impact remained after implementation of existing regulations, mitigation measures were recommended in order to reduce any significant impacts. Where mitigation measures were not required, it is noted in the following table.

Table 4-1
Mitigation Monitoring and Reporting Checklist

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
AESTHETICS								
	Mitigation measures are not required.							
AGRICULTURE AND FORESTRY RESOURCES								
	Mitigation measures are not required.							
AIR QUALITY								
	Mitigation measures are not required.							
BIOLOGICAL RESOURCES								
BIO-1	<p>General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources. The following measures shall be implemented prior to and during construction as follows:</p> <p>a. Within 3 days prior to the start of vegetation removal and/or ground disturbing activities (i.e., grading/excavations), a preconstruction biological resources clearance survey shall be conducted by the Project Biologist. The Biologist shall look for special status plant and animal species within the Project site. If a special status species is identified, it shall be avoided using temporary no-work buffers until the individual leaves on its own or is relocated pursuant to applicable regulations. Buffers for CEQA and/or FESA species shall be demarcated by the qualified biologist in coordination with CDFW and/or USFWS. CDFW and/or USFWS shall be notified in accordance with CESA and/or FESA, as applicable to the identified species, and any permits needed for take of the species shall be</p>	Project Applicant, Construction Contractor, Qualified Biologist	Within 3 days Prior to Vegetation Removal and/or Ground Disturbing Activities; During Construction	Community Development Department	Prior to and During Construction			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	<p>obtained. Results of the survey shall be provided to the City.</p> <p>b. Prior to vegetation removal and/or ground disturbing activities (i.e., grading/excavations), the Biologist shall clearly delineate the limits of disturbance to avoid unplanned impacts within the non-buildable area.</p> <p>c. The Project Biologist shall conduct a worker education program at a pre-construction meeting that includes identification, avoidance and reporting procedures regarding nesting birds, bat maternity colonies, and special status plants and animals with a moderate or higher chance to occur on the Project site.</p> <p>d. If any CEQA or FESA protected wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.</p>							

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
BIO-2	Tree Replacement and Preservation Plan. Prior to vegetation removal or ground disturbance activities, the Project Applicant/Developer shall retain a certified arborist to prepare and submit a Tree Replacement and Preservation Plan for review and approval by the City; and shall obtain all required permits/approvals consistent with the requirements of Sierra Madre Municipal Code, Chapter 12.20, <i>Tree Preservation and Protection</i> and the hillside-specific requirements under Chapter 17.52 <i>Hillside Management Zone</i> , including Sections 17.52.100(A)(4) (Flood Plan Requirements), 17.52.100(C)(6) (Vegetation Mapping Requirements), 17.52.100(C)(8) (Suitability Analysis Requirements), and 17.52.180 (Biotic Resources Management Plan Requirements). The final plan shall be based on recommended mitigation measures, tree protection measures, and measures for the removal of polyphagous shot hole borer trees as detailed in the <i>Stonehouse Project Arborist Report</i> dated March 2016. The Tree Replacement and Preservation Plan shall address replacement ratio and species requirements, tree relocation feasibility, tree protection measures, and monitoring of post-planting success. Should it be determined that there is inadequate available planting space to accommodate the required replacement trees, the City shall require planting native trees or related species approved by the director on public property identified by the City, and/or payment of an in-lieu fee to the City's tree replacement fund.	Project Applicant/ Developer, Certified Arborist	Prior to Vegetation Removal or Ground Disturbance Activities; During Construction; Post-construction Follow Up	Community Development Department	Prior to Vegetation Removal or Ground Disturbance Activities; Post-construction Monitoring			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
BIO-3	<p>Nesting Bird Season Restrictions and Pre-Construction Surveys. The clearance of vegetation construction shall occur outside of the nesting bird season (nesting bird season defined herein as February 1 through September 15), if feasible. If vegetation removal and/or demolition outside this time period is not feasible, the following additional measures shall be employed to avoid impacts to nesting birds protected under the MBTA and CFGC.</p> <p>A pre-construction nesting bird survey shall be conducted by a qualified biologist (i.e., a biologist familiar and experienced with the identification and life histories of wildlife and plant species in southern California) within 3 days (72 hours) prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. Nests found shall be recorded.</p> <p>If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, a qualified biologist shall monitor the nest on a bi-weekly (twice a week) basis, or at a frequency necessary to determine potential project impacts, and the construction activity shall be postponed within the buffer until the biologist determines that the nest is no longer active.</p> <p>If the recommended nest avoidance buffer zone is not feasible, the qualified biologist shall provide justification on a case-by-case basis if a buffer reduction is possible, taking into</p>	Project Applicant, Construction Contractor, Qualified Biologist	Outside Nesting Season (February 1 - September 15) if feasible; Within 3 days (72 hours) Prior to Construction if During Nesting Season	Community Development Department	Prior to and During Construction			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	<p>consideration the location of work and type of activity, distance of nest from work area, surrounding vegetation, and line-of-sight between the nest and work areas, tolerance of species to disturbance, and observations of the nesting bird's reaction to construction activities (including light, noise, dust, and human presence).</p> <p>If the biologist determines nesting activities may fail as a result of work activities, work activities shall be modified or shall temporarily cease (except access along established roadways) within the recommended no disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site.</p> <p>Buffers shall be delineated (by or under the supervision of a qualified biologist) onsite with bright flagging, for easy identification by staff and the construction team. The perimeter of the buffer (300 feet to 500 feet depending on the species) shall be flagged so as not to draw predator attention to the direct location of the nest itself and flagging will be minimized where feasible. The onsite construction supervisor and operator staff shall be notified of the nest and the buffer limits to ensure it is maintained.</p> <p>A summary of preconstruction surveys, monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season and submitted to the City.</p>							

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
BIO-4a	<p>Pre-Construction Roosting Bat Survey. Pre-Construction Roosting Bat Survey. Prior to vegetation removal occurring between April 1 and August 31, the Project proponent shall retain a qualified Biologist (i.e., familiar with bat species and with conducting bat surveys) to conduct at least one daytime and one nighttime bat survey throughout the Project site (plus a 100-foot buffer as access allows) to check for signs of active bat use, including guano, urine staining, and bat vocalizations (detected using ultrasonic acoustic equipment). Additional surveys may also be conducted, as recommended by the qualified Biologist, if the initial survey results are inconclusive. A discussion of survey results, including negative findings, shall be provided to the City and, if active maternity roosts are identified, to the California Department of Fish and Wildlife (CDFW). If active maternity roosts are identified, the Project proponent and qualified Biologist shall consult with and receive written concurrence from the CDFW to establish appropriate avoidance buffers and implement measures to avoid, minimize, and mitigate impacts to bat maternity colonies based on CDFW recommendations. No project activities shall occur within the established buffer area until a qualified Biologist verifies the maternity roost is no longer in use.</p> <p>If construction activities begin outside the bat maternity season (September 1 through March 31), a qualified Biologist shall conduct at least one pre-construction survey no more than 14 days prior to vegetation removal to determine if bats are day-roosting in the project area. If</p>	Project Applicant, Construction Contractor, Qualified Biologist	<p>Prior to Vegetation Removal between April 1 and August 31; Within 14 days</p> <p>Prior to Vegetation Removal if Outside Bat Maternity Season (September 1 - March 31)</p>	Community Development Department	Prior to and During Construction			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	day-roosting bats are detected, consultation with CDFW shall occur prior to vegetation removal to determine appropriate exclusion methods and timing restrictions. Any identified day-roost sites shall be monitored by a qualified Biologist. No project activities shall occur within the established buffer area until a qualified Biologist verifies the day-roost can be humanely evicted/excluded. If no roosting bats are detected during the pre-construction survey, vegetation removal may proceed without restriction.							
BIO-4b	Tree Removal. To the greatest extent feasible, tree trimming and tree removal shall be performed outside the bat maternity season (April 1 through August 31) to avoid direct impact to non-volant young that may roost in trees within the Project site. If the qualified Biologist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw where the terrain and site conditions allow to be done safely. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a qualified Biologist. Trees that are known to be a bat roost shall not be bucked or mulched immediately. A period of at least 24-48 hours, as determined by the qualified Biologist, shall elapse prior to such operations to allow bats to escape.	Project Applicant, Construction Contractor, Qualified Biologist	Prior to and During Vegetation Removal	Community Development Department	Prior to and During Construction			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
BIO-4c	Bat Roost Compensatory Mitigation. If the Project impacts occupied maternity bat-roosting habitat and/or humane eviction/exclusion of bats is performed, the Project proponent shall provide alternate roosting habitat to ensure no net loss of bat-roosting habitat. The design, numbers, and locations of these artificial bat roost structures shall be determined in coordination with CDFW and a qualified Biologist. The qualified Biologist shall prepare a management plan for the bat roost structures for CDFW to review and approve. If CDFW does not respond within 30 days, the plan shall be considered approved. At a minimum, the management plan shall include: a map of the locations of roost structures; management actions of the structures; and monitoring of roost structures for bat occupancy.	Project Applicant, Construction Contractor, Qualified Biologist	Prior to and During Vegetation Removal if occupied by bats	Community Development Department	Prior to and During Construction			
CULTURAL RESOURCES								
CR-1	Prior to the issuance of grading permits, the Applicant shall retain a qualified Archaeologist and Native American Tribal representative(s) to monitor grading and other ground disturbances related to site development. The Archaeologist, in consultation with the Tribe(s) and City, shall develop a Cultural Resources Monitoring Plan (CRMP) to address the details, timing, and protocols of all cultural resources activities that occur on the Project site. At the Project pre-grading meeting, the Archaeologist, the Tribal representative(s), the Applicant, and the excavation and grading contractor shall discuss appropriate grading and ground disturbing methods within archaeologically and culturally sensitive areas	Project Applicant/ Developer, Qualified Archaeologist, Construction Contractor, Native American Tribal Representative(s)	Prior to Issuance of Grading Permits; During Grading and Ground-Disturbing Activities	Community Development Department	Prior to and During Grading, Excavation, and Ground-Disturbing Activities			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	<p>on the Project site pursuant to the CRMP. Should the Archaeologist, after consultation with the consulting Tribe(s), find the potential exists for impacts to archaeological resources, cultural resources and/or sacred sites, the archaeologist and the Native American tribal representative(s) shall actively monitor Project-related grading and in the event that cultural resources are discovered, shall have the authority to temporarily divert, redirect, or halt grading activity to allow recovery of archaeological and/or cultural resources.</p> <p>All cultural material will be temporarily stored on the Project site until final disposition is determined. The Applicant shall relinquish ownership of all Native American cultural material, including sacred items, burial goods, and all archaeological artifacts and non-human remains discovered to the consulting Tribe(s) for final disposition. Leaving artifacts in place (in situ) or reburial of them on site are the preferred methods of mitigation. Reburial shall not occur until all cataloguing and basic recordation has been completed. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting all monitoring activities conducted by the Project archaeologist and Native Tribal Monitor(s). All reports produced will be submitted to the City of Sierra Madre, the South Central Coastal Information Center, California State University, Fullerton, and the consulting Tribe(s).</p>							

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
ENERGY								
Mitigation measures are not required.								
GEOLOGY AND SOILS								
GEO-1	Prior to issuance of grading permits, the City of Sierra Madre shall confirm that grading and construction plans for the Project to incorporate design recommendations provided in the <i>Geologic and Soils Engineering Exploration Update</i> and <i>Geologic and Soils Engineering Exploration Update</i> prepared by Irvine Geotechnical, Inc. dated November 2014 and December 2019, respectively. The design recommendations shall address site preparation; construction swimming pools, foundation design, retaining walls, temporary excavations, corrosion, floor slabs, concrete decking, paving, drainage waterproofing and site observation.	Project Applicant, City of Sierra Madre	Prior to Issuance of Grading Permits	City of Sierra Madre Building and Safety Division	Prior to Issuance of Grading Permits			
PALEO-1	Prior to the issuance of grading permits, the Project Applicant shall provide written evidence to the City of Sierra Madre that the Applicant has retained a qualified paleontologist to observe ground disturbing activities, recover fossil resources as necessary, and catalogue the recovered specimens. The Paleontologist will attend the pre-grade conference where they will establish procedures for paleontological monitoring and, through the preparation of a Paleontological Resources Impact Mitigation Program (PRIMP), shall establish procedures and protocols to temporarily halt ground disturbing activities to permit sampling, evaluation, and recovery of any discovery. Excavations that impact older Quaternary deposits may encounter fossil vertebrates. Any substantial excavations below	Project Applicant, Qualified Paleontologist	Prior to Issuance of Grading Permits; Present at Pre-Grade Conference; During Ground Disturbing Activities	Community Development Department	Prior to and During Construction			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	the uppermost layers of the surface should be monitored. Sediment samples should also be recovered to determine the small-fossil potential of the site. If a discovery is determined to be significant, additional excavations and salvage of the fossil may be necessary to ensure that any impacts to it are mitigated to a less than significant level. A final monitoring report shall be prepared that describes the results of the monitoring program and evaluates any fossil resources recovered.							
GREENHOUSE GAS EMISSIONS								
Mitigation measures are not required.								
HAZARDS AND HAZARDOUS MATERIALS								
HAZ-1	Prior to issuance of a demolition permit/demolition of buildings that are expected to contain asbestos containing building materials or lead based paint, the Applicant/Developer shall prepare an asbestos and lead paint survey and present the findings to the City Community Development Department and Building and Safety Division. In the event asbestos containing building materials or lead paint are identified, it shall be removed and disposed of in accordance with local, state and federal regulations and guidance of a California Occupational Safety and Health Administration (Cal/OSHA)-Certified Asbestos Consultant (CAC) and/or Lead-Related Construction Inspector/Assessor. If contaminated materials are identified and removed, proof of proper disposal (e.g., report, email, or receipts from the certified consultant/inspector/assessor) shall be	Project Applicant/ Developer, Construction Contractor	Prior to Issuance of Demolition Permit	Community Development Department, Building and Safety Division	Prior to Issuance of Demolition and Building Permits			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	provided to the City prior to issuance of a building permit.							
HYDROLOGY AND WATER QUALITY								
Mitigation measures are not required.								
LAND USE AND PLANNING								
Mitigation measures are not required.								
MINERAL RESOURCES								
Mitigation measures are not required.								
NOISE								
NOI-1	No large bulldozers, loaded trucks, or other heavy vibratory-inducing equipment shall be operated within 10 feet of an offsite structure existing at the time of preparation of the Project's EIR, including the carriage house (shed) located immediately west of the Project site. Prior to issuing a grading permit, the City's Planning and Community Preservation Department or Building and Safety Division shall verify that the grading plans identify any offsite structure and the minimum 10-foot buffer. The minimum 10-foot buffer shall be marked in the field and discussed with the grading contractor and equipment operators during a pre-grading field meeting.	Project Applicant, Construction/ Grading Contractor, Planning and Community Preservation Department or Building and Safety Division	Prior to Issuing a Grading Permit; Prior to Commencement of any Ground-Disturbing Activity; During Construction	Project Applicant, Construction/ Grading Contractor, Planning and Community Preservation Department or Building and Safety Division	Prior to and During Construction/ Grading			
POPULATION AND HOUSING								
Mitigation measures are not required.								
PUBLIC SERVICES								
Mitigation measures are not required.								
RECREATION								
Mitigation measures are not required.								
TRANSPORTATION								
Mitigation measures are not required.								

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
TRIBAL CULTURAL RESOURCES								
TCR-1	<p>Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.</p> <p>A. The Project Applicant/Lead Agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject Project at all Project locations (i.e., both onsite and any offsite locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and</p>	Project Applicant/ Lead Agency, Native American Tribal Representative (Gabrieleño Band of Mission Indians – Kizh Nation)	Prior to Commencement of any Ground- Disturbing Activity	Community Development Department	During all Ground- Disturbing Activities			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	<p>any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project Applicant/Lead Agency upon written request to the Tribe.</p> <p>D. Onsite tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the Project Applicant/Lead Agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the Kizh to the Project Applicant/Lead Agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact Kizh TCRs.</p>							
TCR-2	Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh	Native American Tribal Representative (Kizh Monitor/ Archaeologist), Construction Contractor	During Ground-Disturbing Activities	Community Development Department	During Ground-Disturbing Activities			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.							
TCR-3	<p>Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.</p> <p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods are discovered or recognized on the Project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.</p> <p>C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).</p> <p>D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.</p> <p>Any discovery of human remains/ burial goods shall be kept confidential to prevent further disturbance.</p>	Project Applicant, Construction Contractor, Native American Tribal Representative, County Coroner	During Ground-Disturbing Activities	County Coroner, Community Development Department	During Ground-Disturbing Activities			

Mitigation Number	Mitigation Measures	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
UTILITIES AND SERVICE SYSTEMS								
	Mitigation measures are not required.							
WILDFIRE								
	Mitigation measures are not required.							