

# CHAPTER 3

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## Additions and Corrections to the Draft PEIR

This chapter contains revisions to the Draft PEIR as a result of responses to comments received on the Draft PEIR during the public review period from June 27, 2024, to August 12, 2024. As described in Chapter 1, *Introduction*, to this Final PEIR, additions and corrections have been made to various sections of the Draft PEIR to provide clarity or revisions based on comments received on the Draft PEIR.

The changes described in this chapter do not result in any new or increased significant environmental impacts that would result from implementing the Project. The revised text does not provide new information that identifies new significant environmental impacts and does not identify mitigation measures that, if implemented, would result in significant environmental impacts. Instead, the additions and corrections made to the Draft PEIR below merely “clarifies or amplifies or makes insignificant modifications” in the already adequate Draft PEIR, as is permitted by State CEQA Guidelines Section 15088.5(b). Therefore, the text changes provided below do not change any of the conclusions presented in the Draft PEIR in a manner that would require recirculation of the Draft PEIR.

### 3.1 Revisions to the Draft PEIR

The additions and corrections that follow are made to the text of the Draft PEIR in this chapter of the Final EIR. Amended text is identified by Draft PEIR page number. Additions to the Draft PEIR text are shown with underline and text removed from the PEIR is shown with ~~strike through~~. The additions and corrections to the Draft EIR have been included in this volume with the stated format to easily disclose these minor changes or revisions to the Draft PEIR to the public and decision-makers of the Project.

#### Executive Summary

Mitigation Measures 4.5-1, 4.5-2, 4.5-3, 4.5-7, and 4.5-8 within Table ES-1 on Pages ES-15 through ES-21 would be amended for clarification purposes, consistent with the minor text changes listed below. These minor text changes would also be applied to the same mitigation measures listed on Pages 4.5-30 through 4.5-33 (Cultural Resources). The mitigation measures would be amended to:

**Mitigation Measure 4.5-1 Historic Built Resources.** Prior to development of any future discretionary project within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior’s Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All

identified historic resources will be assessed for the project's potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be evaluated for its potential significance under National and State criteria prior to Los Angeles County's approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, Los Angeles County shall require appropriate mitigation to lessen the impact to the degree feasible.

**Mitigation Measure 4.5-2: Archaeological Resources Assessment.** Prior to conducting construction activities for future discretionary projects that would involve ground disturbance, the project proponent shall retain an archaeologist meeting the minimum PQS set forth by the Secretary of the Interior (codified in 36 CFR Part 61; 48 Federal Register 44738–44739) (Qualified Archaeologist) to conduct an archaeological resources assessment. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a Sacred Lands File search at the California Native American Heritage Commission (NAHC); geoarchaeological review including a focused assessment of land use history and any available geotechnical data to assess the potential for subsurface archaeological resources; a pedestrian field survey in instances where ground surface is exposed; recordation of all identified archaeological resources on DPR 523 forms; evaluation of resources affected by the project for eligibility for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment.

Resources that do not qualify as historical resources shall be considered by the Qualified Archaeologist for qualification as unique archaeological resources as defined in Public Resources Code Section 21083.2(g). The technical report also shall provide recommendations as to whether additional studies are warranted to further identify or evaluate archaeological resources (i.e., Extended Phase I boundary delineation, Phase II testing and evaluation) and if archaeological monitoring and Native American monitoring of ground disturbing activities is warranted (e.g., in areas where there is a higher potential to encounter buried resources). Prior to the initiation of field work for any Extended Phase I or Phase II investigation, the Qualified Archaeologist shall prepare a work plan outlining the investigation's objectives, goals, and methodology. If archaeological monitoring is warranted, the Qualified Archaeologist shall determine the locations and duration of monitoring and reporting requirements. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to archaeological resources assessments, Extended Phase I and Phase II reports, and monitoring reports).

**Mitigation Measure 4.5-3: Construction Worker Cultural Resources Sensitivity Training.** For future discretionary projects with ground disturbing activities that may encounter potentially significant archaeological resources, the Qualified Archaeologist shall implement a cultural

resources sensitivity training program. The Qualified Archaeologist, or its designee, shall instruct all construction personnel of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, applicable laws protecting archaeological resources, and confidentiality of discoveries. In the event that construction crews are phased, additional trainings shall be conducted for new construction personnel. The project proponent or its contractors shall ensure construction personnel are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

**Mitigation Measure 4.5-7: Paleontological Resources Assessment and Monitoring.** For future discretionary projects developed under the WSGVAP within the communities of South Monrovia Islands and South San Gabriel that involve ground disturbance, the project proponent shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP) definition for qualified professional paleontologist (Qualified Paleontologist) to prepare a paleontological resources assessment report prior to the start of construction activities.

The report shall include methods and results of the paleontological resources assessment, monitoring requirements (including depths, frequency, and reporting), and maps that outline where monitoring is required. Monitoring shall follow SVP Guidelines: no monitoring of ground-disturbing activities within units of Low Sensitivity or No Potential; monitoring of all ground-disturbing activities (with depths specified) in units of Low to High Significance; and at all depths within units of High Significance unless the Qualified Paleontologist's report identifies previous disturbances or the use of construction methods which do not warrant monitoring; and monitoring at the initiation of excavation in units of Undetermined Significance. The report also shall stipulate whether screen washing is necessary to recover small specimens following SVP Guidelines and determine whether unique geologic features are present onsite. If monitoring is conducted, then the Qualified Paleontologist shall prepare a final report summarizing monitoring results and submit it to the project proponent and the County.

**Mitigation Measure 4.5-8: Paleontological Resources Sensitivity Training.** Prior to the start of ground disturbing activities for future discretionary projects developed under the WSGVAP within the communities of South Monrovia Islands and South San Gabriel, the Qualified Paleontologist or its designee shall conduct construction worker paleontological resources sensitivity training (or may be provided via digital recording) for all construction workers. Construction workers shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The project proponent shall ensure that construction workers are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

## Chapter 3, Project Description

Table 3-2 on Page 3-15 would be amended as follows:

**TABLE 3-2**  
**WSGVAP VISION STATEMENTS AND GROWTH AND PRESERVATION STRATEGIES**

Vision Statement	Growth and Preservation Strategies
<b>Harmonious and Coordinated Growth</b>	Encourage diverse housing options by promoting ADUs, mixed-use development, affordable housing and 'missing middle' housing in appropriate zones.
	Upzone areas near transit and commercial hubs for multifamily housing, aligning with sustainable growth principles.
	Enable new commercial nodes and local-serving businesses to locate at key intersections and community gateways (e.g., accessory commercial uses).
	Distribute community facilities equitably to support the well-being of all residents.
	Coordinate growth with infrastructure improvements and investments that support walkable, green, safe, and connected communities.
	Implement community design standards that guide new development to be aesthetically and environmentally harmonious with existing neighborhood.
<b>Thriving Business-Friendly Region</b>	Identify through <b>outreach</b> to the business community barriers that are impeding new commercial and employment investments in the WSGV Planning Area.
	Create incubator programs and local business support initiatives that <b>foster entrepreneurship</b> , focusing on leveraging local talents and resources.
	Support small and medium-sized enterprises (SMEs) through <b>streamlined processes</b> and access to resources.
	Develop incentives and support for businesses implementing sustainable practices.
	Promote diversity in locally-based businesses by providing platforms for minority and women-owned businesses.
<b>Connected and Walkable Communities</b>	Expand public transportation options, <u>infrastructure, and amenities</u> , especially in underserved areas, to reduce dependency on private vehicles.
	Facilitate more walkable communities by designating neighborhood greenways that create safe, comfortable, and scenic routes to key destinations.
	Develop pedestrian pathways through cul-de-sacs to enhance walkability and neighborhood connectivity.
	Identify gaps where sidewalks, bike lanes, and trail connectivity are needed and desired to create safe and connected communities.
<b>Strong Social and Cultural Cohesion</b>	Foster community-driven development projects that provide spaces for socializing, cultural events, recreation, and entertainment.
	Identify centrally located vacant and underutilized sites that are publicly available, or could be privately incentivized, to develop as uses beneficial to the community and for potential community gathering (e.g., community gardens, pocket parks, local markets, etc.).
	Launch cultural celebration programs to foster inclusiveness and appreciation of diverse communities.
<b>Resilient and Sustainable Built and Natural Environment</b>	Preserve the sensitive resources, scenic hillsides, conservation areas, agricultural lands, parks, open spaces, water channels, and equestrian amenities that characterize the WSGV Planning Area.
	Identify locations to <b>enhance and restore</b> these sensitive resources and amenities for current and future populations (e.g., connected wildlife corridors, clean water resources, green infrastructure).

Vision Statement	Growth and Preservation Strategies
Equitable Decision-Making	Prioritize the needs of disproportionately affected communities in the allocation of funding and capital investments, to ensure the equitable distribution of resources and amenities, and to address environmental injustices, correct social and economic inequities, and support the health, safety, and well-being of all WSGV residents.
	Enhance digital and virtual platforms for community engagement to ensure broad participation in planning processes.
	Regularly assess community needs to inform equitable distribution of resources and amenities

## Chapter 4, Environmental Analysis

WSGVAP Land Use Element Policy LU-7.4 on Pages 4.3-40 (Air Quality), 4.8-45 (Greenhouse Gas Emissions), 4.11-36 (Land Use and Planning), and 4.17-24 (Transportation) would be amended to:

**Policy LU-7.4: Repurpose underutilized surface parking.** Encourage developments with underutilized surface parking to repurpose spaces for community gathering and temporary community events, including parklets, plazas and paseos.

WSGVAP Land Use Element Policy LU-10.1 on Pages 4.1-15 (Aesthetics) 4.3-41 (Air Quality), 4.8-45 (Greenhouse Gas Emissions), and 4.11-39 (Land Use and Planning) would be amended to:

**Policy LU-10.1: Promote heat-resilient urban design.** Promote the integration of heat resilience measures in new developments projects, through requirements for cool roofs and pavements, increased pervious surfaces, shading, optimized building orientation, and the incorporation of native landscaping features designed to mitigate heat.

WSGVAP Conservation and Open Space Element Policy COS-1.1 on Page 4.4-23 (Biological Resources) would be amended to:

**Policy COS-1.1: Strengthen ecosystem preservation for biodiversity.** Ensure the protection and enhancement of biological resources through strategic habitat preservation efforts, including actions to acquire and conserve areas of high biological significance, sensitive natural communities, and SEA-designated land.

WSGVAP Conservation and Open Space Element Policy COS-1.2 on Page 4.4-23 (Biological Resources) would be amended to:

**Policy COS-1.2: Protect habitat areas and wildlife linkages.** Coordinate with County agencies and adjacent jurisdictions to conserve, ~~and~~ protect and enhance habitat areas and wildlife linkages in SEAs and other areas, taking special consideration into studying ~~the~~ connections to the Verdugo Mountains, San Rafael Hills, and surrounding ~~and~~ waterways (~~e.g.,~~ such as streams, and washes).

WSGVAP Conservation and Open Space Element Policy COS-1.3 on Page 4.4-23 (Biological Resources) would be amended to:

**Policy COS-1.3: Engage and educate the community in preserving biodiversity.** Foster community education and stewardship around biological conservation, restoration, and climate adaptation, and the challenges to restore native habitat whether in yards, parks, or degraded open spaces.

WSGVAP Conservation and Open Space Element Policy COS-1.5 on Page 4.4-23 (Biological Resources) would be amended to:

**Policy COS-1.5: Restored habitat on degraded lands.** Collaborate with agencies, jurisdictions, and nongovernmental organizations to prevent degradation of lands from oil and gas drilling and surface mining and other impactful uses in areas ~~ensure that habitat is restored on degraded lands (e.g., those used for oil and gas drilling, surface mining operations, and other impactful uses)~~ near biologically sensitive resources and ensure that fuel modification best practices are in place to protect native species and habitat.

WSGVAP Conservation and Open Space Element Policy COS-2.2 on Page 4.4-24 (Biological Resources) would be amended to:

**Policy COS-2.2: Foster safe wildlife crossings.** Support the development of Connect fragmented habitat through safe wildlife crossings, such as overpasses and culverts, as alternatives to street crossings. ~~and connecting of fragmented habitat.~~

WSGVAP Conservation and Open Space Element Policy COS-2.4 on Page 4.4-24 (Biological Resources) would be amended to:

**Policy COS-2.4: Facilitate Species Migration.** Identify and protect existing and potential networks of habitat connectivity, linkages, and wildlife corridors between open spaces, reserves, and protected areas to facilitate species migration and range shifts in consideration of future climate change impacts.

WSGVAP Conservation and Open Space Element Policy COS-2.5 on Page 4.4-24 (Biological Resources) would be amended to:

**Policy COS-2.5: Habitat Stepping-Stones.** Create habitat stepping-stones on County-owned or managed properties and County facilities to better link to SEAs and sensitive habitats in the region and encourage the same on other lands.

WSGVAP Conservation and Open Space Element Policy COS-3.2 on Page 4.4-24 (Biological Resources) would be amended to:

**Policy COS-3.2: Habitat-Sensitive Designs.** Ensure that developments in and adjacent to SEAs incorporate wildlife-permeable fencing, limit removal of native vegetation, limit non-native vegetation and incorporate design features that support and enhance the biodiversity and natural processes of the region.

WSGVAP Conservation and Open Space Element Policy COS-3.3 on Page 4.4-24 (Biological Resources) would be amended to:

**Policy COS-3.3: Increase native vegetation and tree canopy coverage across WSGV.** To decrease heat-island effects and increase biodiversity, encourage private and commercial property owners to increase landscaping in Landscape urban and suburban spaces with locally native plant species that function well in urban conditions and thrive in smaller, isolated stands of vegetation such as in parking lots, driveways, and parkways. ~~to foster biodiversity and decrease heat island effects.~~

WSGVAP Conservation and Open Space Element Policy COS-3.4 on Page 4.4-24 (Biological Resources) would be amended to:

**Policy COS-3.4: Increase native vegetation and tree canopy coverage on County-owned parcels.** Require the use of locally native vegetation on County-owned parcels and projects, such as in as feasible (e.g., community parks, and government buildings, as feasible, etc.).

WSGVAP Conservation and Open Space Element Policy COS-3.6 on Page 4.4-24 (Biological Resources) and 4.7-21 (Geology and Soils) would be amended to:

**Policy COS-3.6: Preserve vegetated hillsides for erosion control.** Implement conservation practices to maintain and enhance vegetated hillsides, mitigating erosion, and reducing the risk of land/mudslides, particularly following wildfires, thereby enhancing climate change resilience.

WSGVAP Conservation and Open Space Element Policy COS-3.7 on Page 4.1-15 (Aesthetics) and 4.4-24 (Biological Resources) would be amended to:

**Policy COS-3.7: Limit light pollution and disturbance to wildlife species.** Limit or restrict lighting towards natural areas at night to limit light pollution and disturbance to wildlife species by encouraging implementation of the County’s Rural Outdoor Lighting District Ordinance (ROLD) practices outside of mandated areas, and by requiring the installation of timers to automatically shut lights during “dark hours” ~~in the middle of the night~~ at night to protect wildlife from the effects of artificial light.

WSGVAP Conservation and Open Space Element Policy COS-3.8 on Page 4.4-24 (Biological Resources) would be amended to:

**Policy COS-3.8: Biodiverse Urban Forest.** Ensure the planting of a locally native, climate-appropriate urban forest in parks, public rights-of-way, and on private properties to support locally native and migratory species, help build healthier soils, enrich biodiversity, and improve community health and well-being.

WSGVAP Conservation and Open Space Element Policy COS-3.9 on Page 4.4-25 (Biological Resources) would be amended to:

**Policy COS-3.9: Sensitive Tree-Trimming on Public Properties.** Public agencies responsible for maintaining trees along public rights-of-way, on public properties, and in open spaces and parks must avoid tree maintenance activities during bird nesting season, generally between February and August, and schedule pruning for various species at their respective optimal times.

WSGVAP Conservation and Open Space Element Policy COS-3.10 on Page 4.4-25 (Biological Resources) would be amended to:

**Policy COS-3.10: Sensitive Tree-Trimming Education.** Support educational programming that informs the public and businesses to avoid tree maintenance activities during bird nesting season, generally between February and August to foster responsible tree-trimming practices and maintain tree canopy to the maximum extent feasible.

WSGVAP Conservation and Open Space Element Policy COS-3.11 on Page 4.4-25 (Biological Resources) would be amended to:

**Policy COS-3.11: Replace Displaced Vegetation and Tree Canopy.** When a development displaces pre-existing tree canopy provide replacement trees and vegetation to restore the tree canopy and increase the coverage area over time.

WSGVAP Conservation and Open Space Element Policy COS-4.2 on Page 4.1-15 (Aesthetics), 4.4-25 (Biological Resources), and 4.16-18 (Recreation) would be amended to:

**Policy COS-4.2: Provide multi-benefit open spaces.** Ensure the creation and enhancement of open space and passive recreational areas that deliver multiple environmental and community benefits. These spaces should integrate water quality improvements, support groundwater recharge, provide locally native habitat, mitigate heat island effects, enable habitat connectivity, enhance biodiversity, and offer means of equitable access compatible with sensitive biological resources.

WSGVAP Conservation and Open Space Element Policy COS-4.3 on Page 4.1-15 (Aesthetics), 4.4-25 (Biological Resources), and 4.16-18 (Recreation) would be amended to:

**Policy COS-4.3: Minimize habitat fragmentation in open space design.** Design open spaces, including trails and public access to recreation areas, to minimize habitat fragmentation and avoid impacts to sensitive habitat areas, while optimizing ~~available space for the~~ passive recreation.

WSGVAP Conservation and Open Space Element Policy COS-5.2 on Page 4.4-25 (Biological Resources) would be amended to:

**Policy COS-5.2: Protect nesting sites.** Preserve potential nesting sites and habitats for native migratory and resident bird species, including owls and raptors, wherever they are found or have been known to occur. Provide temporary protective buffering around nesting sites of species sensitive to disturbance.

WSGVAP Conservation and Open Space Element Policy COS-7.3 on Page 4.10-18 (Hydrology and Water Quality) would be amended to:

**Policy COS-7.3: Encourage best groundwater management practices.** Encourage private property owners to implement best practices to manage surface water runoff by installing cisterns and other such structures to capture and re-use roof, driveway, and other solid surface runoff.

WSGVAP Conservation and Open Space Element Policy COS-8.1 on Page 4.4-25 (Biological Resources) and 4.10-19 (Hydrology and Water Quality) would be amended to:

**Policy COS-8.1: Promote healthy streambeds and rivers.** Support healthy streams, rivers, and their associated riparian ecosystems by dechannelizing rivers and streambeds, diverting water from existing channels to create soft-bottom streams and riparian areas and restoring natural riparian vegetation to promote wildlife usage, where and when feasible.

WSGVAP Conservation and Open Space Element Policy COS-8.2 on Page 4.4-25 (Biological Resources) and 4.10-19 (Hydrology and Water Quality) would be amended to:

**Policy COS-8.2: Naturalized water channels.** Prioritize the use of bioengineering alternatives over traditional "hard" solutions such as concrete or riprap for flood protection, where feasible.



Favor naturalistic, ecologically sensitive approaches that align with stream preservation, riparian habitat creation, and ecological integrity.

WSGVAP Conservation and Open Space Element Policy COS-8.3 on Page 4.4-26 (Biological Resources), 4.10-19 (Hydrology and Water Quality), and 4.19-18 (Utilities and Service Systems) would be amended to:

**Policy COS-8.3: Multi-benefit spaces for water quality improvements.** Provide multi-benefit spaces incorporating environmental services with water quality improvements. These can include slowing and capturing water for groundwater recharge, redirecting water into newly created tributaries and riparian areas, installing bioswales, using locally native vegetation, and creating habitat for birds and pollinators. Provide suitable public access where feasible.

WSGVAP Conservation and Open Space Element Policy COS-9.4 on Page 4.4-26 (Biological Resources) and 4.10-19 (Hydrology and Water Quality) would be amended to:

**Policy COS-9.4: Prohibit alteration of streams for stream crossings.** Protect existing stream resources by prohibiting alteration or modifications that could negatively affect water quality or watershed health. Set a minimum distance for bridge columns to be located outside streambeds and banks. Wherever possible, shared bridges shall be used and wildlife passages incorporated when desirable.

WSGVAP Mobility Element Policy M-2.2 on Page 4.3-41 (Air Quality), 4.6-16 (Energy), 4.8-45 (Greenhouse Gas Emissions), and 4.17-22 (Transportation) would be amended to:

**Policy M-2.2: Enhance regional transit service through partnerships.** Coordinate with LA Metro and other transit agencies to advocate and ~~provide for reliable, safe, and high-quality service that connect unincorporated communities in the West San Gabriel Valley to the rest of the region.~~ Encourage convenient and safe transit, pedestrian, and bicycle linkages to/from ~~transit service and~~ mobility hubs to facilitate first last-mile connectivity.

~~Work with transit agencies and neighboring jurisdictions to improve the efficiency of the public transportation system through bus-only lanes, signal prioritization, and useful transfer windows to the larger regional transportation network.~~

~~Work with LA Metro to develop First/Last Mile plans at two Metro A Line stations in the WSGV area—Sierra Madre Villa Station and Monrovia Station, as well as four bus stop FLM areas within WSGV communities identified in the 2023 Active Transportation Strategic Plan. These FLM areas include Altadena Drive/Lake Avenue and Woodbury Road/Lincoln Avenue in Altadena, as well as Rosemead Boulevard/Huntington Drive and Rosemead Boulevard/Colorado Boulevard in East Pasadena—East San Gabriel.~~

WSGVAP Mobility Element Policy M-3.6 and M-3.7 on Page 4.6-17 (Energy) and 4.17-23 (Transportation) would be amended to:

~~**Policy M-3.6: Apply the latest accessibility standards.** Evaluate proactively adopting Public Right of Way Accessibility Guidelines (PROWAG) through an ADA transition update that reflects the latest version of the guidelines and creates a prioritization and funding strategy for addressing ADA deficiencies in WSGV communities to ensure accessibility for vulnerable users.~~

**Policy M-3.67: Enhance signage and wayfinding.** Create distinctive wayfinding and signage throughout communities to facilitate active transportation connectivity and guide residents and visitors to local services and amenities.

## Appendix C. WSGVAP Plan Area Communities: Land Use and Zoning Modifications Maps

The Draft PEIR was prepared in conjunction with the Draft West San Gabriel Valley Area Plan and associated supporting information such as the WSGVAP Proposed Land Use Policy and Zoning Web App (available online at: <https://lacounty.maps.arcgis.com/apps/instant/sidebar/index.html?appid=0017dce2842049e2b6b573538744b780>). The Web App is dynamic and as part of ongoing outreach efforts undertaken by the County, has been updated frequently since publication of the Draft EIR. As such, all of the Land Use and Zoning Maps included within Appendix C have been updated online. At this time, revised figures are not proposed to be included within the Final PEIR, as the County's outreach is ongoing. The WSGVAP Proposed Land Use Policy and Zoning Web App should be used for up-to-date Land Use and Zoning information.