

## MITIGATION MONITORING PROGRAM

This Mitigation Monitoring Program (MMP) has been prepared in compliance with the requirements of Public Resources Code (PRC) Section 21081.6 and California Environmental Quality Act (CEQA) Guidelines Section 15097. This MMP describes the procedures that will be followed to implement the mitigation measures identified in the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the West Covina Medical Center Behavioral Health Building Addition project at 725 South Orange Avenue in the City of West Covina (proposed project) and adopted in connection with the approval of the proposed project. The intent of this MMP is to establish the following:

- (1) Verify satisfaction of the required mitigation measures identified in the IS/MND;
- (2) Provide a methodology to document implementation of the required mitigation measures;
- (3) Provide a record of the monitoring program;
- (4) Identify monitoring responsibility;
- (5) Establish administrative procedures for the clearance of mitigation measures;
- (6) Establish the frequency and duration of monitoring; and
- (7) Utilize existing review processes wherever feasible.

The City of West Covina, as the Lead Agency, is responsible for overseeing and enforcing implementation of the MMP, which shall be carried out by the City and other entities (e.g., Applicant/Construction Contractor), as shown in **Table 1**.

<b>TABLE 1: MITIGATION MONITORING PROGRAM</b>				
<b>Mitigation Measure</b>	<b>Monitoring Phase</b>	<b>Responsible Party</b>	<b>Enforcement / Monitoring Party</b>	<b>Action Indicating Compliance</b>
<b>BIOLOGICAL RESOURCES</b>				
<b>BR-1</b> All tree removal and tree trimming activities shall be performed prior to or after the bird-breeding season of February 1st through August 31st (i.e., only between September 1 and January 31). If clearing/vegetation removal or tree trimming is planned to occur during the breeding season, a nest survey shall be conducted by a qualified biologist no more than one week prior to any clearing or tree trimming activities. Work may proceed only if no active bird nests are detected. The biologist conducting the nest survey shall document a negative survey with a report indicating that no impacts to active avian nests shall occur.	Prior to Construction	Applicant/ Construction Contractor	Planning / Building Division	Approval of nest survey by Planning Division prior to construction plan approval
<b>CULTURAL RESOURCES</b>				
<b>CR-1</b> If archaeological resources are encountered during ground-disturbing activities, the City of West Covina Community Development Department shall be immediately informed of the discovery. All work shall cease in the area of the find or diverted away from the discovery to a distance of 50 feet until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in PRC Section 21083.2. Personnel of the project shall not collect or move any archaeological materials or associated materials. Construction activity may continue unimpeded on other portions of the project site. Construction shall not resume in the locality of the discovery until the identified resources are properly assessed and consultation between the qualified archaeologist, the City of West Covina Community Development Department, the applicant's representative, and all other concerned parties takes place and reaches a conclusion approved by the City of West Covina Community Development Department.  The qualified archaeologist shall be retained by the project applicant to determine if the find is classified as a significant cultural resource pursuant to the CEQA definition of historical resources (CEQA Guidelines Section 15064.5[a]) and/or unique archaeological resources (PRC Section 21083.2[g]). If the resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," the qualified archaeologist shall make recommendations on the treatment and disposition of the find. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Section 21083.2(b) for unique archaeological resources. The treatment plan shall be reviewed by the City of West Covina	During Ground-Disturbing Activities (e.g., site clearing, grading, and excavation)	Applicant/ Construction Contractor	Planning / Building Division	Planning Division approval of report prepared by the qualified archaeologist prior to obtaining Certificate of Occupancy

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<p>Community Development Department prior to implementation. Upon approval by the City of West Covina Community Development Department, the treatment plan shall be implemented, and the City shall be provided with a final report on the treatment and disposition of the find prior to issuance of a Certificate of Occupancy.</p> <p>Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. See Mitigation Measure <b>TR-2</b> for archaeological material that are Native American in origin.</p>				
<b>GEOLOGY AND SOILS</b>				
<p><b>GS-1</b> In the event paleontological resources are encountered during construction, the City of West Covina Community Development Department shall be immediately informed of the discovery. All work shall cease in the area of the find and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. The City shall require that all paleontological resources identified on the project site be assessed and treated in a manner determined by the qualified paleontologist. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any significant paleontological resources found during construction monitoring shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository under the oversight of the qualified paleontologist. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. Work in the area of the discovery shall resume once the find is properly documented and the qualified paleontologist authorizes resumption of construction work.</p>	<p>During Ground-Disturbing Activities</p>	<p>Applicant/ Construction Contractor</p>	<p>Building Division</p>	<p>Certificate of Occupancy</p>

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<b>NOISE</b>				
<p><b>N-1</b> The construction contractor shall develop and implement a Noise Control Plan to minimize excessive noise levels at the existing West Covina Medical Center during construction. At a minimum, the Noise Control Plan shall require the following:</p> <ul style="list-style-type: none"> <li>• Prior to initiating construction activity, the construction contractor shall coordinate with the West Covina Medical Center administration to discuss construction activities that would generate high noise levels. Coordination between the administration and the construction contractor shall continue on an as-needed basis throughout the construction phase of the proposed project to minimize potential disruption to medical facilities.</li> <li>• Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with muffling devices consistent with manufacturers' standards. All equipment shall be properly maintained to assure that no additional noise would be generated due to worn or improperly maintained parts.</li> <li>• The construction contractor shall use "quiet" gasoline-powered compressors or electrically powered compressors as well as electric rather than gasoline- or diesel-powered forklifts for small lifting, where feasible.</li> <li>• The construction contractor shall locate construction equipment as far as feasible from adjacent or nearby noise-sensitive receptors.</li> </ul>	Prior to and During Construction	Applicant/ Construction Contractor	Building Division	<p>Prior to Construction: Planning and Building Divisions' approval of Noise Control Plan</p> <p>During Construction: Field inspection sign-off</p>
<b>TRANSPORTATION</b>				
<p><b>T1</b> The existing crosswalk at the Orange Avenue/Cameron Avenue intersection shall be converted to white continental crosswalks to provide greater visibility and safety to pedestrians and motorists.</p>	During Construction	Applicant/ Construction Contractor	Engineering Division	Certificate of Occupancy
<p><b>T2</b> The applicant shall comply with all measures identified in the Transportation Impact Study for the proposed project. These measures include the following:</p> <ul style="list-style-type: none"> <li>• Install red curb markings and signage to prohibit on-street parking along the west side of Orange Avenue along the project site frontage (assuming a north-south orientation for Orange Avenue). The existing red curb marking immediately south of the project site driveway shall be extended by approximately 40 feet to connect with the next southerly red curb marking on Orange Avenue.</li> <li>• All existing red curb markings on Orange Avenue shall be refreshed</li> </ul>	During Construction	Applicant/ Construction Contractor	Engineering Division	Certificate of Occupancy

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<p>for visibility.</p> <ul style="list-style-type: none"> <li>Remove the existing two-hour parking sign that is located to the north of the existing entrance canopy.</li> <li>Trim the existing trees and bushes along the west side of the Orange Avenue/freeway off-ramp north of the project site driveway to maintain a clear line of sight between motorists and oncoming motorists.</li> <li>Install advance warning signs for southbound approaching vehicles coming from the freeway off-ramp on both sides of Orange Avenue to indicate the presence of an intersection/driveway further ahead (see Figure 2-4, Intersection Sight Distance at Project Driveway, of the Transportation Impact Study for the proposed project for the proposed signs and the location of these signs).</li> <li>Install/refresh the red curb markings for 20 feet on either side of the two driveways for the off-site parking lot (i.e., at the Garvey Avenue South and Orange Avenue driveways).</li> <li>Install signs at the two driveways of the off-site parking lots to indicate that the usage of the off-site parking lot is for the West Covina Medical Center staff and visitors only.</li> </ul>				
<b>TRIBAL CULTURAL RESOURCES</b>				
<p><b>TR-1</b> The project applicant shall retain a Native American monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh). The Native American monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the proposed project at all project locations (i.e., both on-site and any off-site locations that are included in the project description and/or required in connection with the proposed project, such as public improvement work). “Ground-disturbing activity,” as defined by the Kizh, includes, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>A copy of the executed monitoring agreement shall be submitted to the 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>The Native American monitor shall complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Kizh. Monitor</p>	<p>Prior to and During Ground-Disturbing Activities</p>	<p>Applicant/ Construction Contractor</p>	<p>Building Division</p>	<p>Prior to Ground-Disturbing Activities: provide contact information of monitor and a copy of the executed monitoring agreement to Planning Division prior to construction plan approval</p> <p>During Ground-Disturbing Activities: provide daily monitoring logs prior to field inspection sign-off</p> <p>After Ground-</p>

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<p>logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the lead agency upon written request.</p> <p>On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the Kizh from a designated point of contact for the project applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the proposed project are complete; or (2) a determination and written notification by the Kizh or Native American monitor to the project applicant and lead agency that no future, planned construction activity and/or construction phase at the project site possesses the potential to impact tribal cultural resources.</p>				Disturbing Activities: provide letter to Planning Division confirming that ground-disturbing activities have concluded or that the construction activity/phase would not have the potential to impact tribal cultural resources
<p><b>TR-2</b> Upon discovery of any tribal cultural resources, 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 tribal cultural resources has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.</p>	During Ground-Disturbing Activities	Applicant/ Construction Contractor	Building Division	Certificate of Occupancy
<p><b>TR-3</b> Native American human remains are defined in PRC Section 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 PRC Section 5097.98, are also to be treated according to this statute.</p> <p>If Native American human remains and/or grave goods are discovered or recognized on the project site, construction activities shall be diverted at a minimum of 150 feet from the discovery and an exclusion zone shall be placed around the burial. PRC Section 5097.9 and Health and Safety Code Section 7050.5 shall be followed. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. Work shall continue to be diverted while the coroner determines whether the remains are Native American. If the County Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Native American</p>	During Construction	Applicant/ Construction Contractor	Building Division	Certificate of Occupancy

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<p>Heritage Commission shall be contacted by telephone within 24 hours. If the finds are determined to be Native American, the coroner will notify the Native American Heritage Commission as mandated by state law, who will then appoint a Most Likely Descendent.</p> <p>Human remains and grave/burial goods shall be treated alike per PRC Section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>				
<b>SOURCE:</b> TAHA, 2025				