

**FINAL  
CEQA INITIAL STUDY  
MITIGATED NEGATIVE DECLARATION**

**ORANGE COUNTY YOUTH TRANSITION CENTER JUVENILE HALL  
REPLACEMENT PROJECT**

**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION  
NO. PP24-0174**

*Prepared for:*



**County of Orange  
OC Public Works  
OC Facilities Design & Construction Management  
601 North Ross Street  
Santa Ana, California 92701**

*Prepared by:*

**LSA Associates, Inc.  
3210 El Camino Real, Suite 100  
Irvine, California 92602**

**January 2025**

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## Chapter 1: Introduction

### 1.1 Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines (*State CEQA Guidelines*) Section 15074, the County of Orange (County), as the Lead Agency, must consider the Initial Study and Mitigated Negative Declaration (IS/MND) for the Orange County Youth Transition Center Juvenile Hall Replacement Project (proposed project) together with any comments received during the public review process. Responses have been prepared to the comment received during the public review period.

This document comprises the Final IS/MND for the proposed project. It includes the comments received during the public review period, responses to the comments, and an Errata section that clarifies, amplifies, or makes minor modifications to the Draft IS/MND text. The Draft IS/MND and technical appendices are provided in Appendix A.

While information provided in this Final IS/MND revises the Draft IS/MND, no substantive changes have been made to the information contained in the Draft IS/MND as a result of the comments received on the Draft IS/MND, and no significant new information has been added that would require recirculation of the document pursuant to *State CEQA Guidelines*, Section 15088.5.

### 1.2 Project Site Location

The approximately 17-acre project site is located at 331 The City Drive South in the City of Orange (City) in the County of Orange (County). The project site is bounded by Interstate 5 (I-5) and the Santa Ana River to the east, Service Way to the north, Justice Center Way to the south, and Hospital Frontage Road to the west. The project site is located within the City of Orange, which is bordered by the cities of Anaheim, Santa Ana, Garden Grove, and Villa Park, as well as unincorporated areas of Orange County.

### 1.3 Proposed Project

The County of Orange Public Works (County) proposes to overhaul the existing Orange County Juvenile Hall Campus (Campus) located on an approximately 17-acre property at 331 The City Drive South in the City of Orange, California. The Orange County Juvenile Hall facility is an institution for juvenile law violators between the ages of 12 and 25 and is operated by the Orange County Probation Department. The proposed project consists of demolition of portions of the current Campus for development of the new buildings to be implemented in three phases. Phase 1 would primarily consist of development of the new YTC that would operate independently of Juvenile Hall with added housing for youth, and dining, culinary, education, and vocational spaces along with recreational exterior areas. Phase 2 would consist of a new long-term housing unit and a classroom-library building that would be developed for use within the Campus secure perimeter. In addition, a Transitional Age Youth (TAY) housing unit would also be built outside of the Campus secure perimeter. Phase 3 is still in the design phase and would generally consist of tenant improvements to the remaining buildings. In order to comply with modern code requirements, Phases 1 and 2 would include associated accessibility, open space, and landscaping and hardscaping improvements. The new state-of-the-art facilities would be designed to provide a noninstitutional, home-like environment and incorporate effective and therapeutic programs to ensure successful outcomes for residents and reduce recidivism.

An IS/MND has been prepared for the proposed project in accordance with *State CEQA Guidelines* Section 15070.

#### **1.4 CEQA Requirements**

*State CEQA Guidelines* Section 15204(b) states that “persons and public agencies should focus on the proposed finding that the project will not have a significant effect on the environment. If persons and public agencies believe that the project may have a significant effect, they should: identify the specific effect; explain why they believe the effect would occur; and explain why they believe the effect would be significant.”

The County provided the mandatory 30-day period for public and agency review. In addition, in compliance with the Governor’s Executive Order No. N-54-20, Section 8(b), the Notice of Intent to Adopt a Mitigated Negative Declaration and proposed IS/MND were uploaded to the State Clearinghouse (SCH) CEQAnet Web Portal via CEQA Submit. The State Clearinghouse assigned SCH No. 2024120147 to the proposed project.

The Notice of Intent to Adopt a Mitigated Negative Declaration and proposed IS/MND with supporting attachments were available for review by the general public at:

- County of Orange, OC Public Works Development Services/Planning Website: <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/2nd-district/oc-youth-transition-center>
- CEQAnet Web Portal on the Governor’s Office of Land Use and Climate Innovation Website: <https://ceqanet.opr.ca.gov>

In addition to the two online locations identified above, the public Notice of Intent to Adopt a Mitigated Negative Declaration was also provided in the following manner:

- Filed and posted by the Orange County Clerk-Recorder from December 4, 2024, through January 3, 2025;
- Posted at the public entrance of the County Administrative South building at 601 North Ross Street in Santa Ana, California, from December 4, 2024, through January 3, 2025; and
- Posted at the entrance to the Multipurpose Recreation Center (MRC) on the Juvenile Hall Campus (project site) from December 4, 2024, through January 3, 2025.

#### **1.5 Index of Comments Received**

The following is an indexed list of the agencies and individuals that commented on the Draft IS/MND. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed or coded with a number as shown in Table 1 below.

**Table 1: Comments Received During the Public Comment Period**

Comment Code	Signatory	Date
<b>State</b>		
S-1	California Department of Transportation (Caltrans) District 12	12/31/2024

### 1.6 Format of Responses to Comments

Responses to the indexed/coded comment letter are provided on the following pages. A comment index code number is provided in the upper right corner of the comment letter, and individual comments within each letter are numbered along the right-hand margin of each letter. The County's responses to the comments immediately follow the letter and are referenced by the index numbers in the margins. None of the comments received contained any substantive information or questions about the environmental analysis or conclusions contained in the Draft IS/MND. Therefore, no revisions were made to the IS/MND in response to comments.

Proposed revisions to the Draft IS/MND were based on a change in approach for Best Management Practices (BMPs), which would be incorporated into the proposed Project for Hydrology and Water Quality. Proposed revisions to the Draft IS/MND are included in Chapter 3.0, Errata.

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## **Chapter 2: Responses to Comments**

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**2.1 State Agencies**

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# California Department of Transportation



DISTRICT 12  
1750 East 4<sup>th</sup> Street, Suite 100 | SANTA ANA, CA 92705  
(657) 328-6000 | FAX (657) 328-6522 TTY 711  
<https://dot.ca.gov/caltrans-near-me/district12>

December 31, 2024

Ms. Virginia Gomez  
Senior Planner  
OC Public Works  
601 N. Ross Street 4<sup>th</sup> Floor  
Santa Ana, CA 92701

File: LDR/CEQA  
SCH: 2024120147  
12-ORA-2024-02702  
I-5, PM 34.769

Dear Ms. Gomez,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Mitigated Negative Declaration for the Orange County Youth Transition Center Juvenile Hall Replacement Project for Orange County Public Works (OC Public Works). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment.

S-1-1

The project proposes to overhaul the existing Orange County Juvenile Hall Campus to construct new replacement buildings in three phases. Regional access to the site is provided by Interstate 5 (I-5), State Route 57 (SR 57), and State Route 22 (SR 22). Caltrans is a commenting agency on this project and has the following comments:

1. On Page 160 of the Public Review Draft ISMND Document under the Response to Question 4.21 a): Less than Significant Impact, consider adding a discussion of the existing bus services relating to the nearest regional connectivity into the rail services provided by Metrolink and Amtrak Pacific Surliner.
2. Encourage the use of transit among future residents, visitors, and workers of the development. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.
3. The project is adjacent to an existing Class I (off-road) bicycle facility, the Santa Ana River Trail Bikeway. Caltrans recommends the inclusion of secure and functional short-term bike parking. Short-term bike parking at public locations should be placed in visible areas that are close to main destinations and should be installed at least 24" away from walls and other objects (e.g. trash cans, plants, etc.). With the increasing popularity of electric bikes and cargo/utility

S-1-2

S-1-3

S-1-4

bikes, bike parking should also be designed to accommodate different styles, sizes, and weights of bikes (e.g. cargo bike, bike with trailer, adult tricycle, etc.).

- o For additional guidance on bicycle parking best practices, see the "Essentials of Bike Parking" guidance created by the Association of Pedestrian and Bicycle Professionals (link to online PDF: <https://www.apbp.org/Publications>).

S-1-4  
cont.

4. Large operations should include emergency traffic management plans that prevents the local network from being overwhelmed, if feasible.

Creation of emergency plans that include emergency routes and paths, can alleviate congestion in the event of an emergency and allow EMS to easily access the site.

S-1-5

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Joseph Jamoralin at [Joseph.Jamoralin@dot.ca.gov](mailto:Joseph.Jamoralin@dot.ca.gov).

S-1-6

Sincerely,



Scott Shelley  
Branch Chief, Local Development Review-Climate Change-Transit Grants  
Caltrans, District 12

**2.1.1 California Department of Transportation (Caltrans) District 12**

Letter Code: S-1

Date: December 31, 2024

**Response to Comment S-1-1**

This comment provides introductory remarks and summarizes the proposed project.

The County of Orange acknowledges this comment. Because the comment does not contain any substantive information or questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

**Response to Comment S-1-2**

This comment suggests that Response to Question 4.21 a) of the Draft IS/MND be revised to include a discussion of existing bus and rail services providing regional connectivity in the project site vicinity.

The County acknowledges this comment. As discussed in Response to Question 4.21 a) in the Draft IS/MND, the project site is served by several Orange County Transportation Authority (OCTA) bus stops and routes. It should be noted that OCTA bus route 57, which runs along The City Drive adjacent to the project site, provides access to regional rail services provided by Metrolink and the Amtrak Pacific Surfliner at the Anaheim Regional Transportation Intermodal Center (ARTIC) Station, located approximately 1.3 miles northeast of the project site vis-à-vis OCTA bus route 50, which runs along Katella Avenue. Therefore, the proposed project would be served by both local and regional connectivity. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

**Response to Comment S-1-3**

This comment suggests that the proposed project be designed to encourage future residents, visitors, and workers to use transit and lists several potential benefits of transit use.

The County acknowledges this comment. As stated in Response to Question 4.21 a), the project site would be served by several OCTA bus routes, and it is reasonable to assume that employees, visitors, and resident youth may use this mode of alternative transportation to access the proposed project. Based on the project site's proximity to existing bus service, the proposed project would facilitate the use of transit. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

**Response to Comment S-1-4**

This comment notes that the project site is located adjacent to an existing Class I bicycle facility (the Santa Ana River Trail Bikeway) and recommends the inclusion of short-term bicycle parking within the project design.

The County acknowledges this comment. It should be noted that the Santa Ana River Trail Bikeway, though adjacent to the project site, is not directly accessible from the project site due to the presence of a large perimeter wall.

The proposed project would provide bicycle parking to accommodate this mode of transportation, consistent with Section 5.106.4. of the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen), as amended. Specifically, three (3) bicycle parking spots would be provided in front of the proposed Administration building on the northwest corner of the project site. These would be available for use by employees or youth living in the Transitional building, who may use bicycles as a form of transportation.

No revisions were made in response to this comment because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

#### **Response to Comment S-1-5**

This comment notes that large operations should include emergency traffic management plans that prevent the local network from being overwhelmed, if feasible, and describes the purpose of these plans.

The County acknowledges this comment. The proposed project would not introduce new vehicles to the roadways surrounding the project site to the extent that an emergency traffic management plan would be required. No further response is necessary.

#### **Response to Comment S-1-6**

This comment provides concluding remarks.

The County acknowledges this comment. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

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## Chapter 3: Errata

This section of the Final Initial Study/Mitigated Negative Declaration (IS/MND) provides text changes that have been made to clarify, amplify, or make minor edits to the Draft IS/MND text for the proposed Orange County Youth Transition Center Juvenile Hall Replacement Project (proposed project). Such changes are a result of further review of the Draft IS/MND and the feasibility of incorporating infiltration Best Management Practices (BMPs) into the proposed project. The changes described in this section are generally minor changes that do not constitute significant new information, change the conclusions of the environmental analysis, or require recirculation of the document (California Environmental Quality Act [CEQA] Guidelines [State CEQA Guidelines] Section 15088.5).

Changes to the Draft IS/MND text are indicated in this section under the appropriate Draft IS/MND section. Deletions are shown with ~~strikethrough~~ and additions are shown with underlined text.

### 1. Chapter 4.14, Hydrology and Water Quality

Threshold 4.14(a) beginning on page 115-116, and Threshold 4.14(c) on page 119 in Chapter 4.14, Hydrology and Water Quality, have been revised to clarify the specific type of BMPs that will be used in the proposed project. The addition of this clarifying information does not change the analysis in the Draft IS/MND or the level of environmental impact that would result from the proposed project. Consequently, no new feasible project alternatives or mitigation measures have been identified as none are necessary. This change would not substantially alter the conclusions reached in the IS/MND or the validity of the document. In addition, Regulatory Compliance Measure (RCM) HYD-4 has been moved from Threshold 4.14(c) to 4.14(a) because it also applies to the impact analysis for that threshold. These changes were made for clarification only and have no effect on the analysis or conclusions contained in the Draft IS/MND.

**The following revisions were made under Threshold 4.14(a) of the Draft IS/MND, beginning with the third paragraph on page 115:**

As previously stated, a Preliminary WQMP has been prepared for the proposed project. The Preliminary WQMP specifies the Site Design and Source Control BMPs that would be implemented to target the pollutants of concern in runoff from the project site in order to reduce impacts to water quality during operation. As specified in RCM HYD-3, the Preliminary WQMP will be refined and finalized during final design based on the final site plan.

Site Design BMPs would also be utilized for treatment of storm water on site using project design features, consistent with the requirements of the North Orange County Model WQMP<sup>1</sup> and Technical Guidance Document (TGD). The Preliminary WQMP identifies potential BMPs that may be incorporated into the proposed project, including ~~would provide~~ a series of proposed flowthrough planter systems in order to capture and treat stormwater runoff before discharging it into the Santa Ana River Channel. In addition, the Preliminary WQMP noted that the proposed project's design may include up to two

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<sup>1</sup> OC Public Works. 2011. Model Water Quality Management Plan (Model WQMP). May.

modular wetlands systems, which would similarly use biofiltration techniques to capture and treat stormwater. Following the release of the Draft IS/MND for public review, it was determined that the potential use of infiltration BMPs may be feasible for incorporation into the project's design. As of the date when this Final IS/MND was prepared, discussion regarding BMPs is still ongoing, and the WQMP and Hydrology Study were still being updated to reflect a potential change in approach to the BMPs that would address the full design capture volume that applies to the project site and to determine whether those design changes would accomplish the same amount of pollutant diversion and capture. Although the WQMP and Hydrology Study are still being revised to reflect the final design, this IS/MND includes flexibility for project runoff to instead be treated by infiltration planters and other BMPs deemed to be feasible given local geologic and hydrologic conditions.

As previously stated, operational activities of the proposed project are subject to the NPDES Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region, Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062 (MS4 Permit), and a Final Hydrology Report is required to characterize potential drainage changes within the project site under the proposed project and to ensure that the proposed project would not result in an increase in runoff volumes from existing conditions. Therefore, compliance with RCM HYD-1 through RCM HYD-4 would ensure that any shift from biotreatment to infiltration BMPs would not result in any new or increased significant environmental impacts beyond those already evaluated and disclosed in the Draft IS/MND, because final versions of the WQMP and the Hydrology Report would be required prior to the issuance of grading and/or building permits. In addition, it is assumed that professionally trained and equipped maintenance crews from the County's Public Works staff who have experience with maintaining various storm water collection and treatment facilities would be responsible for properly maintaining the BMPs over the life of the project. By doing so, any resulting environmental impacts would be reduced.

As specified in the Preliminary WQMP, the proposed project would also incorporate Source Control BMPs, including routine non-structural BMPs and routine structural BMPs. Specifically, routine non-structural BMPs under the proposed project include education for property owners, tenants, and occupants; activity restrictions (e.g., no discharges of fertilizer, pesticides, and wastes to streets or storm drains; no hosing down of paved surfaces; no vehicle washing or maintenance); common area landscape management; BMP maintenance; common area litter control; employee training; common area catch basin inspection; and street sweeping private streets and parking lots. Routine structural BMPs to be incorporated into the proposed project include storm drain stenciling and signage; design and construction of trash and material storage areas to reduce pollution introduction; and use of efficient irrigation systems and landscape design.

As discussed previously, infiltration of stormwater could have the potential to affect groundwater quality in areas of shallow groundwater. Due to the depth to groundwater,

it is not expected that any stormwater that may infiltrate during construction would affect groundwater quality because there is not a direct path for pollutants to reach groundwater. In addition, the proposed project would be required to implement operational BMPs to pre-treat stormwater before it could reach groundwater. With implementation of RCM HYD-1 through RCM HYD-34, which are required and based on local and State regulations, construction and operational impacts related to waste discharge requirements, water quality standards, and degradation of surface or groundwater quality would be less than significant. No project-specific mitigation is required.

#### **Regulatory Compliance Measures:**

**RCM HYD-1 Construction General Permit.** Prior to issuance of a grading permit, the project Applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the State Water Resources Control Board (SWRCB) via the Stormwater Multiple Application and Report Tracking System (SMARTs). The project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Director of the County of Orange (County) Public Works Department, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the Director of the County Public Works Department, or designee. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction best management practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.

**RCM HYD-2 Groundwater Discharge Permit.** If groundwater dewatering is required during construction of the proposed project, the project Applicant shall submit a Notice of Intent (NOI) for coverage under the permit to the Santa Ana RWQCB at least 60 days prior to the start of excavation activities and anticipated discharge of dewatered groundwater to surface waters in order to obtain coverage under the Waste Discharge Requirements (WDR) Permit for Discharges to Surface Waters That Pose an Insignificant (De Minimis) Threat to Water Quality (Groundwater Discharge Permit) (Order No. R8-2020-0006, NPDES No. CAG998001). Groundwater dewatering activities shall comply with all applicable

provisions in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.

**RCM HYD-3 MS4 Permit.** Prior to the issuance of grading or building permits, the project Applicant shall submit a Final Water Quality Management Plan (WQMP) to the County of Orange (County) Public Works Department, or designee, for review and approval in compliance with the requirements of the NPDES *Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region*, Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062 (MS4 Permit). The Final WQMP shall be prepared consistent with the requirements of the North Orange County Technical Guidance Document for Water Quality Management Plans (TGD) and the North Orange County Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The County of Orange (County) Public Works Department, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design, and shall implement, maintain, and operate all such BMPs in a timely and reasonably diligent manner.

**RCM HYD-4 Final Hydrology Report.** Prior to issuance of a grading permit, the Applicant shall prepare a Final Hydrology Report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions. The project Applicant shall provide the Final Hydrology Report to the County of Orange (County) for review and approval.

The following revisions were made under Threshold 4.14(c) of the Draft IS/MND, beginning with the second paragraph on page 119:

**~~Regulatory Compliance Measure:~~**

**~~RCM HYD-4 Final Hydrology Report.~~** ~~Prior to issuance of a grading permit, the Applicant shall prepare a Final Hydrology Report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions. The project Applicant shall provide the Final Hydrology Report to the County of Orange (County) for review and approval.~~

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## Chapter 4: 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 plan. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring plan 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 2, Mitigation Monitoring and Reporting Program, has been prepared for the proposed project. This Mitigation Monitoring and Reporting Program is intended to provide verification that all applicable regulatory compliance measures, standard conditions, and mitigation measures relative to significant environmental impacts are monitored and reported. Monitoring will include: (1) verification that each regulatory compliance measure, standard condition, and mitigation measure has been implemented; (2) creating a record of the actions taken to implement each regulatory compliance measure, standard condition, and mitigation measure; and (3) retention of records demonstrating implementation of regulatory compliance measures, standard conditions, and mitigation measures in the County of Orange Youth Transition Center Juvenile Hall Replacement Project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project, but also allows the County flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that regulatory compliance measures, standard conditions, and mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the MMRP (Table 2). If an adopted regulatory compliance measure, standard condition, or mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

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

- The County distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the IS/MND, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the County and responded to on a case by case basis.
- Periodic meetings may be held during project implementation to report on compliance with mitigation measures.
- Responsible parties provide the County 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.

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<b>BIOLOGICAL RESOURCES</b>						
<p><b>RCM BIO-1</b> <b>Migratory Bird Treaty Act.</b> In order to avoid potential impacts to nesting birds that are protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, vegetation clearing or construction activities that impact or encroach upon existing vegetation shall be conducted outside the general bird nesting season (February 15 through August 31). If construction occurs during the nesting season, a preconstruction nesting bird survey shall be conducted by a qualified biologist within 3 days prior to vegetation removal or at the beginning of construction activities. If a nest with eggs or young of any species covered under the MBTA or the California Fish and Game Code is found, work shall not be permitted within a buffer distance to be determined by the qualified biologist involved. Commencing project construction activities, including vegetation clearing, outside of the primary nesting season for birds reduces the need for preconstruction nesting bird surveys.</p>	<p>If construction occurs during the nesting season, a preconstruction nesting bird survey shall be conducted by a qualified biologist.</p>	<p>Three days prior to and during vegetation removal and/or construction activities</p>	<p>Project Applicant/ Construction Contractor/ Qualified Biologist</p>			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p><b>RCM BIO-2</b> <b>Roosting Bat Protection Measures.</b> In the event that any of the trees identified as containing potential roosting habitat within the Biological Resources Assessment (November 2024) prepared for the proposed project are removed during project construction activities, the construction contractor shall ensure that the trees are removed in two phases. During the first phase, the tree limbs shall be removed leaving the main trunk of the tree. This action will create disturbance resulting in the bats leaving the tree that evening and not returning. The following day, the remainder of the tree can be removed.</p>	<p>In the event that any of the trees identified as containing potential roosting habitat within the Biological Resources Assessment prepared for the proposed project are removed during project construction activities, the tree(s) shall be removed in two phases.</p>	<p>During vegetation removal</p>	<p>Construction Contractor</p>			
<p><b>RCM BIO-3</b> <b>Tree Preservation Permit.</b> Consistent with Section 7-9-69.4 of the County of Orange Municipal Code, a Tree Preservation Permit application shall be required and submitted to the Deputy Director of Orange County Development Services, or designee, prior to removal of the singular California sycamore tree that was observed in the northern-central portion</p>	<p>If removal or encroachment into the Tree Protection Zone of the singular California sycamore tree of concern occurs, a Tree Preservation Permit shall be required.</p>	<p>Prior to removal of the singular California sycamore tree identified on the project site</p>	<p>Project Applicant / Orange County Public Works (OCPW), or designee</p>			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
of the project site, or obtained prior to any encroachment into the Tree Protection Zone. The application, as a whole, shall be reviewed and approved by the County of Orange Director of Public Works, or designee. The project Applicant shall adhere to any instructions provided by the Deputy Director of Orange County Development Services, or designee, regarding Replacement Trees.						
<b>CULTURAL RESOURCES</b>						
<b>MM CUL-1 Cultural Resources Sensitivity Training.</b> Prior to ground disturbing activities, a qualified archaeologist shall conduct a pre-grading meeting with contractors and construction personnel to provide cultural resources sensitivity training for all construction personnel. The training shall describe the type of resources that may be identified, procedures to be followed during ground disturbance, and protocols that apply in the event that unanticipated resources are discovered. The crew shall be cautioned not to collect artifacts and directed to inform a construction	Before ground-disturbing activities occur, a pre-grading cultural resource sensitivity training shall be held.	Prior to ground-disturbing activities	Qualified Archaeologist / Construction Contractor			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p>supervisor and the on-site archaeological monitor in the event that cultural remains are discovered during the course of construction, including if a cultural resources monitor is not present. A qualified archaeologist is someone who either meets the Secretary of the Interior's Professional Qualification Standards for archaeology (48 Federal Register 44738) and is a Registered Professional Archaeologist or has a Bachelor of Arts in archaeology or a closely related field and is a Registered Archaeologist.</p>						
<p><b>MM CUL-2 Inadvertent Archaeological Discoveries.</b> In the event that any cultural resources are encountered during earthmoving activities, all work within 50 feet of the find shall be halted until a qualified archaeologist can evaluate the findings and make recommendations. The archaeologist may evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, to assess the significance of the</p>	<p>In the event that any cultural resources are encountered during earthmoving activities, all work within 50 feet of the find shall be halted until a qualified archaeologist can evaluate the findings and make recommendations.</p>	<p>During earthmoving activities</p>	<p>Qualified Archaeologist / Construction Contractor</p>			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
find and identify avoidance or other measures as appropriate. If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within the immediate area of the discovery shall be redirected and the find must be evaluated for significance by a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (National Park Service 1983).						
<b>RCM CUL-1 Human Remains.</b> In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County of Orange (County) Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains	In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately.	During ground-disturbing activities	County Coroner / Construction Contractor / OCPW, or designee			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p>are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the County of Orange (County) Public Works Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health</p>						

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.						
<b>GEOLOGY AND SOILS</b>						
<b>MM GEO-1 Compliance with the Recommendations in the Geotechnical Investigation.</b> Prior to the issuance of demolition or grading permits, the County of Orange (County) Public Works Department shall verify that requirements and recommendations in the Geotechnical Investigation have been appropriately incorporated into the project plans. All grading operations and construction shall be conducted in conformance with all of the recommendations included in the Geotechnical Investigation, which was prepared by Geocon West, Inc., titled Geotechnical Investigation Orange County Youth Transition Center Project (OC YTC) (Geotechnical Investigation) (March 15, 2024) as well as any subsequent Geotechnical Reports prepared for the project. All recommendations found in the Geotechnical Investigation shall be	Grading operations and construction shall be conducted in accordance with the recommendations presented in the Geotechnical Investigation.	Prior to the issuance of Demolition or Grading Permits	OCPW / Construction Contractor			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p>incorporated into project design and shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Seismic design recommendations</li> <li>• Foundation design recommendations</li> <li>• Lateral design recommendations</li> <li>• Preliminary pavement recommendations</li> <li>• Grading recommendations</li> <li>• Construction considerations</li> </ul> <p>Additional site construction plans, including grading plans, shall be reviewed by the project Geotechnical Consultant prior to construction to check for conformance with all of the recommendations of the Geotechnical Investigation. Design, grading, and construction shall be performed in accordance with the requirements of the applicable seismic standards identified in the Geotechnical Investigation, as well as the recommendations of the project Geotechnical Consultant as summarized in the Geotechnical Investigation subject to review by the Orange County Public</p>						

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
Works, prior to the start of grading activities.						
<p><b>MM GEO-2 Paleontological Resources.</b> Prior to the commencement of ground-disturbing activities, a qualified, professional paleontologist who meets the standards set by the Society of Vertebrate Paleontology (SVP) shall be retained to develop a Paleontological Resources Impact Mitigation Program (PRIMP) for this project. The PRIMP shall be consistent with the guidelines of the SVP and shall include the methods that will be used to protect paleontological resources that may exist within the project limits, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of ground disturbance.</p> <p>If ground-disturbing activities occur in deposits with high paleontological sensitivity (i.e., Young Alluvial Fan Deposits below a depth of 10 feet), those activities shall be monitored by a qualified</p>	Ground-disturbing activities shall be conducted in accordance with the PRIMP. If ground-disturbing activities occur in areas with high paleontological sensitivity, paleontological monitoring will occur.	Prior to ground-disturbing activities	Qualified Paleontologist			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p>paleontological monitor following the PRIMP. If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance. Once soils have been monitored during the excavation stage and determined to lack the presence of paleontological resources, monitoring of these soils would no longer be necessary for the remainder of grading activities. In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and the paleontologist or paleontological monitor shall be contacted to assess the find for scientific significance. If determined to be scientifically significant, the fossil shall be collected from the field.</p> <p>Collected resources shall be prepared to the point of identification, identified to the</p>						

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
lowest taxonomic level possible, cataloged, and curated into the permanent collections of a museum repository. At the conclusion of the monitoring program, a report of findings shall be prepared to document the results of the monitoring program.						
<b>HAZARDS AND HAZARDOUS MATERIALS</b>						
<b>MM HAZ-1</b> <b>Compliance with the Recommendations in the Asbestos Survey Reports.</b> Prior to and during demolition, a State of California Licensed Abatement Contractor shall perform removal of all asbestos containing materials. Removal of Asbestos Containing Materials shall be conducted in accordance with U.S. Environmental Protection Agency (USEPA) and Occupational Safety and Health Administration (OSHA) requirements and federal, State, and local rules and regulations to reduce airborne fiber concentrations. In addition, personal protective equipment and decontaminant	Demolition activities shall be conducted in accordance with the recommendations presented in the Asbestos Survey Reports.	Prior to and during demolition	State of California Licensed Abatement Contractor			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
methods shall be used by all workers on the project site.						
<b>HYDROLOGY AND WATER QUALITY</b>						
<b>RCM HYD-1 Construction General Permit.</b> Prior to issuance of a grading permit, the project Applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the State Water Resources Control Board (SWRCB) via the Stormwater Multiple Application and Report Tracking System (SMARTs). The project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Director of the County of Orange (County) Public Works	Prior to construction activities that may affect the project site’s drainage characteristics, an NPDES Construction General Permit shall be secured. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit.	Prior to issuance of a Grading Permit	Project Applicant / OCPW, or designee			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p>Department, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the Director of the County Public Works Department, or designee. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction best management practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.</p>						

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p><b>RCM HYD-2 Groundwater Discharge Permit.</b> If groundwater dewatering is required during construction of the proposed project, the project Applicant shall submit a Notice of Intent (NOI) for coverage under the permit to the Santa Ana RWQCB at least 60 days prior to the start of excavation activities and anticipated discharge of dewatered groundwater to surface waters in order to obtain coverage under the Waste Discharge Requirements (WDR) Permit for Discharges to Surface Waters That Pose an Insignificant (De Minimis) Threat to Water Quality (Groundwater Discharge Permit) (Order No. R8-2020-0006, NPDES No. CAG998001). Groundwater dewatering activities shall comply with all applicable provisions in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.</p>	<p>If groundwater dewatering is required, a Groundwater Discharge permit shall be secured. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.</p>	<p>60 days prior to the start of excavation activities</p>	<p>Project Applicant / OCPW, or designee</p>			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p><b>RCM HYD-3 MS4 Permit.</b> Prior to the issuance of grading or building permits, the project Applicant shall submit a Final Water Quality Management Plan (WQMP) to the County of Orange (County) Public Works Department, or designee, for review and approval in compliance with the requirements of the NPDES Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region, Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062 (MS4 Permit). The Final WQMP shall be prepared consistent with the requirements of the North Orange County Technical Guidance Document for Water Quality Management Plans (TGD) and the North Orange County Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project area. The County of Orange (County) Public Works Department, or</p>	<p>A Final WQMP shall be submitted to the County Public Works Department, or designee, for review and approval in compliance with the requirements of the NPDES Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s). The Final WQMP shall specify the BMPs to be incorporated into the project design.</p>	<p>Prior to issuance of Grading or Building Permits</p>	<p>Project Applicant / OCPW, or designee</p>			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design, and shall implement, maintain and operate all such BMPs in a timely and reasonably diligent manner.						
<b>RCM HYD-4 Final Hydrology Report.</b> Prior to issuance of a grading permit, the Applicant shall prepare a Final Hydrology Report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions. The project Applicant shall provide the Final Hydrology Report to the County of Orange (County) for review and approval.	A Final Hydrology Report shall be prepared and provided to the County for review and approval.	Prior to issuance of a Grading Permit	Project Applicant			
<b>NOISE</b>						
<b>RCM N-1 Construction Noise and Vibration.</b> The construction contractor shall limit construction activities to between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday and between the hours of 9:00 a.m. and 8:00 p.m. on Sunday or a	Construction activities will only be permitted within a particular time frame (7:00 a.m. and 8:00 p.m., Monday through Saturday;	During construction	Construction Contractor			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
federal holiday. Construction is prohibited outside these hours.	9:00 a.m. and 8:00 p.m. on Sunday or a federal holiday).					
<b>RCM N-2</b> <b>Final Acoustical Report.</b> Prior to issuance of any certificates of building permits, the project Applicant shall submit a Final Acoustical Report, prepared by a qualified acoustical consultant, to be reviewed and approved by the City Building Official, or their respective designee. The City Building Official, or their respective designee, shall verify that the Final Acoustical Report demonstrates that all sensitive rooms with exterior façades comply with the City’s interior noise standard.	A Final Acoustical Report will be prepared and verified by the City Building Official.	Prior to issuance of building permits	Project Applicant / Qualified Acoustical Consultant			
<b>RCM N-3</b> <b>Interior Noise.</b> Provide mechanical ventilation (e.g., an air-conditioning system) to all noise-sensitive rooms to ensure that windows can remain closed for a prolonged period of time.	Noise-sensitive rooms shall be equipped with mechanical ventilation.	During and Post Construction	Project Applicant / Construction Contractor			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p><b>MM N-1</b>     <b>Acoustical Memorandum.</b> Prior to the issuance of the final occupancy permit, a qualified acoustical consultant shall prepare a memorandum to demonstrate that noise from on-site HVAC equipment does not exceed existing ambient noise levels by 3 A-weighted decibels (dBA) at the closest off-site property to the north and south once the details and specifications of the on-site HVAC equipment are determined.</p>	<p>An acoustical memorandum shall be prepared based on HVAC specifications.</p>	<p>Prior to issuance of Final Occupancy Permit</p>	<p>Qualified Acoustical Consultant</p>			
<p><b>MM N-2</b>     The construction contractor shall restrict heavy construction equipment (e.g., large bulldozers and loaded trucks) or require the use of light construction equipment (e.g., small bulldozers and trucks) within 15 feet from all building structures.</p>	<p>The use of heavy equipment shall be restricted or modified.</p>	<p>During construction</p>	<p>Construction Contractor</p>			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<b>TRIBAL CULTURAL RESOURCES</b>						
<p><b>SC TCR-1 Unanticipated Discovery of Native American Resources.</b> If unanticipated archaeological resources or deposits are discovered during ground-disturbing activities, Orange County Public Works (OC Public Works) shall implement the following measures. All work shall halt within a 50-foot radius of the discovery. OC Public Works shall retain a qualified professional archaeologist with knowledge of Native American resources to assess the significance of the find. If the resources are Native American in origin, OC Public Works shall coordinate with the Tribe regarding evaluation, treatment, curation, and preservation of these resources. The archaeologist shall have the authority to modify the no-work radius as appropriate, using professional judgment in consultation with OC Public Works. Work shall not continue within the no work radius until the archaeologist conducts sufficient research and evidence and data collection to establish that the resource is either: (1) not cultural in origin; or (2) not</p>	<p>If unanticipated archaeological resources or deposits are discovered during ground-disturbing activities, preservation procedures will be followed.</p>	<p>During ground-disturbing activities</p>	<p>Qualified Archaeologist / OCPW</p>			

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<p>potentially eligible for listing on the California Register of Historical Resources. If a potentially eligible resource is encountered, then the archaeologist and OC Public Works, as lead agency, in consultation with the Tribe, shall arrange for either: (1) avoidance of the resource, if possible; or (2) test excavations to evaluate eligibility, and if eligible, attempt to resolve adverse effects through implementation of appropriate mitigation, which may include, but shall not be limited to, salvage excavation, laboratory analysis and processing, research, curation, and preparation of a report summarizing the find. The assessment of eligibility shall be formally documented in writing as verification that the provisions in the California Environmental Quality Act for managing unanticipated discoveries and Public Resources Code Section 5024 have been met.</p>						

**Table 2: Mitigation Monitoring and Reporting Program**

Regulatory Compliance Measure/Mitigation Measure/Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	VERIFICATION OF COMPLIANCE		
				Initials	Date	Remarks
<b>UTILITIES AND SERVICE SYSTEMS</b>						
<p><b>RCM UTL-1 Orange County Water Efficient Landscape Ordinance.</b> Prior to the issuance of any grading or building permit, the project Applicant shall prepare and submit a Landscape Plan to the Interim Director of the County of Orange (County) Public Works Department, or designee. The County of Orange (County) Public Works Department, or designee, shall confirm that the Landscape Plan for the proposed project is consistent with all applicable provisions outlined in the County’s Landscape Water Efficiency Ordinance, as codified in Ordinance No. 16-002.</p>	<p>A Landscape Plan shall be prepared in a manner consistent with all applicable provisions of the County’s Landscape Water Efficiency Ordinance.</p>	<p>Prior to issuance of Grading or Building Permit</p>	<p>Project Applicant</p>			

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## **APPENDIX A**

### **DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

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