
Mitigation, Monitoring, and Reporting Program

Eaton Wash Stormwater Capture Project

SCH No. 2026040378

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Prepared for:

CITY OF PASADENA

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The California Environmental Quality Act (CEQA) requires that public agencies adopting a Mitigated Negative Declaration (MND) take affirmative steps to determine that approved mitigation measures and project design features are implemented subsequent to project approval. The lead or responsible agency must adopt a monitoring and reporting program for the mitigation measures incorporated into a project or included as conditions of approval. The program must be designed to ensure compliance with the MND during project implementation (Public Resources Code, Section 20181.6; CEQA Guidelines, Section 15074(d)).

This Mitigation, Monitoring, and Reporting Program (MMRP) will be used by the City of Pasadena (City) to track compliance with adopted mitigation measures associated with the implementation of the proposed Eaton Wash Stormwater Capture Project (project). The City, as Lead Agency pursuant to CEQA, will ensure that all mitigation measures identified for the project are carried out in accordance with the adopted MMRP.

This MMRP consists of a checklist (Table 1) that identifies the mitigation measures, organized by environmental impact category discussed in the MND. The table identifies the mitigation monitoring and reporting requirements, including the timing of verification (e.g., prior to, during, or after construction) and the party responsible for implementing the measure. Space is provided for sign-off following completion/implementation of the mitigation measure.

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Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Measure	Timing of Verification			Responsible Party	Completed		Comments
		Pre Const	During Const	Post Const		Initials	Date	
Air Quality								
Mitigation Measure AQ-1	Fugitive Dust Control During Construction. The City shall require its construction contractor to water exposed soil during construction a minimum of three times per day. The City shall also require its construction contractor to replace ground cover on areas disturbed during construction.		X		City of Pasadena			
Mitigation Measure AQ-2	Construction Equipment Emissions Reductions. Prior to the commencement of construction activities for the project, the City shall require its construction contractor to use California Air Resources Board (CARB) certified Tier 4 engines for all diesel-powered equipment pieces that are 75 horsepower or greater throughout all phases of construction. An exemption from this requirement may be granted under the following two conditions: 1. The City’s construction contractor shall demonstrate that at least three construction fleet owners/operations in Los Angeles were contacted and that those owners/operations confirmed that Tier 4 Final equipment could not be located within Los Angeles County during the desired construction schedule. 2. The proposed replacement equipment has been evaluated using the California Emissions Estimator Model (CalEEMod) or other industry standard emissions estimation method and documentation has been provided to the City to confirm that the reduction to below significant cancer risk resulting from construction emissions is achieved.	X	X		City of Pasadena			
Biological Resources								
Mitigation Measure BIO-1	Special-Status Wildlife Species Surveys. Before commencing ground- or vegetation-disturbing activities, the City will perform a pre-construction survey for special-status wildlife species, including Crotch’s bumble bee (<i>Bombus crotchii</i>), Cooper’s hawk (<i>Accipiter cooperii</i>), western yellow bat (<i>Dasypterus xanthinus</i>), western mastiff bat (<i>Eumops perotis californicus</i>), and western red bat (<i>Lasiurus frantzii</i>) to determine the presence/absence of these species at the site. The survey shall be conducted within 14 days of the start of ground- or vegetation-disturbing activities. A qualified biologist shall walk the entire study area to determine if any special-status avian, mammal, or invertebrate species are observed or detected. The pre-construction surveys shall incorporate appropriate methods and timing as detailed in the approved survey protocol for each target species, to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, in trees, or in loose soil. If any special-status wildlife are observed or detected during the pre-construction surveys, additional measures may be required, in consultation with the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife, such as establishing a buffer around	X			City of Pasadena			

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	known locations and/or monitoring construction near occupied areas. If Crotch’s bumble bee is determined to be present prior to construction, an Incidental Take Permit issued by CDFW would need to be obtained. The City shall prepare and submit a letter report to U.S. Fish and Wildlife Service and California Department of Fish and Wildlife summarizing the methods and results of the surveys.							
Mitigation Measure BIO-2	Monitor Vegetation Clearing. The City will obtain the services of a qualified biologist to observe vegetation removal and monitor for potential conflict with wildlife species. The biologist will prepare daily monitoring logs to document their observations and submit the logs to the City for inclusion in the project’s construction files. If conditions are observed that may lead to wildlife conflicts, the biologist will provide guidance to the construction management team as to how best to avoid impacts on the resource.		X		City of Pasadena			
Mitigation Measure BIO-3	Compliance with Migratory Bird Treaty Act and California Fish and Game Code. The proposed project shall be conducted in compliance with all applicable regulations, including the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code regarding migratory birds. Pursuant to the MBTA and California Fish and Game Code, a qualified biologist shall conduct a pre-construction survey for nesting birds and raptors within the project site and a 500-foot-wide buffer no more than 3 days prior to any vegetation disturbance during the general avian breeding season (February 1–September 30). The project shall avoid take of nesting birds protected under the MBTA and California Fish and Game Code by establishing appropriate no-construction buffer zones around any nests identified during the surveys. The buffer should be 150-300 feet for non-raptor nesting birds, 300 feet for highly sensitive species, and 300–500 feet for nesting raptors. Construction can proceed into the buffer when the qualified Biologist has determined that the nest is no longer active. If the biologist does not find any active nests within or immediately adjacent to the impact areas, the vegetation clearing/ construction work would be allowed to proceed. If the biologist finds an active nest within or immediately adjacent to the vegetation removal area and determines that the nest may be impacted or breeding activities substantially disrupted, the biologist shall delineate an appropriate no-work buffer zone around the nest, depending on the sensitivity of the species, the location of the nest, and the nature of the construction activity, at their discretion. Construction personnel shall be instructed on the sensitivity of nest areas and no-work buffers shall remain in place until the nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging or fencing, and construction personnel shall be instructed on the sensitivity of nest areas.	X			City of Pasadena			
Mitigation Measure BIO-4	Tree Monitoring During Construction Activities. A qualified arborist shall be present during initial ground-disturbing activities on the		X		City of Pasadena			

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	project site to ensure that project activities stay within the demarcated limits. This qualified arborist shall identify the number of City-protected trees that are removed as a result of project construction activities, as well as trees that would be encroached upon. This inventory of trees shall be used to determine an appropriate tree replacement program that shall be, at a minimum, consistent with the City of Pasadena Tree Ordinance (PMC Chapter 8.52) as it relates to tree replacement of protected trees.							
Mitigation Measure BIO-5	Post-Construction Tree Monitoring. All trees that have been substantially root pruned (30% or more of their root zone) during construction within the tree protection zone (a 4-foot radius beyond the dripline for each tree) shall be monitored by an International Society of Arboriculture (ISA) certified arborist for the first 10 years after construction completion. The arborist shall submit an annual report, photograph each tree, and compare tree health and condition to the original, pre-construction baseline to the City. For trees that do not survive the 5-year monitoring period, such trees shall be replaced in accordance with the requirements of PMC Chapter 8.52.			X	City of Pasadena			
Cultural Resources								
Mitigation Measure CUL-1	Archaeological Monitoring. Prior to ground-disturbing activities, the City of Pasadena (City) and/or subsequent responsible parties should retain a Principal Investigator/ Archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards in Archaeology and with experience in California prehistoric and historic resources (experience within Los Angeles County preferred). An archaeological monitor shall be present during all initial ground-disturbing activities for the project. Archaeological monitoring may be adjusted (increased, decreased, or discontinued) at the recommendation of the archaeological principal investigator and based on the inspection of exposed cultural material and the observed potential for soils to contain intact cultural deposits or otherwise significant archaeological material. The archaeological monitor shall be provided a copy of the Cultural Resources Assessment Report for the Eaton Wash Stormwater Capture Project and its pertinent appendices to inform their monitoring efforts. The archaeological monitor shall have the authority to temporarily halt work to inspect areas for potential cultural material or deposits. The requirement for tribal monitoring, while recommended, shall be determined by the lead agency in consultation with the traditionally culturally affiliated tribes with geographic ties to the project area. Daily monitoring logs shall be completed by the on-site archaeological monitor. Within 60 days following completion of construction, the archaeological principal investigator shall provide an archaeological monitoring report to the City. This report shall include the results of the cultural monitoring program (even if negative), including a summary of any findings or evaluation/data recovery efforts, and	X	X		City of Pasadena			

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	supporting documentation that demonstrates all mitigation measures defined in the environmental document were appropriately met. Appendices shall include archaeological monitoring logs and documentation relating to any newly identified or updated cultural resources. This report shall be submitted to the South Central Coastal Information Center (SCCIC) once considered final. While recommended, the requirement to include a Native American Monitor should be determined by the City, having reviewed cultural resources technical findings, through government-to-government consultation with the traditionally culturally affiliated tribes with geographic ties to the project site and in review of the present report findings.							
Mitigation Measure CUL-2	Unanticipated Discovery of Archaeological Resources. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology is provided access to the project site and can assess the significance of the find and determine whether additional study is warranted. The work exclusion buffer may be adjusted as appropriate to allow work to feasibly continue at the recommendation of the archaeological principal investigator. Should it be required, temporary flagging shall be installed around this resource to avoid any disturbance from construction equipment. The potential for avoidance should be the primary consideration of this initial process. Significance of the find shall be assessed as outlined by the California Environmental Quality Act (CEQA) and its implementing guidelines and Section 106 of the National Historic Protection Act. If the archaeological principal investigator observes the discovery to be potentially significant under CEQA and/or the National Historic Protection Act, additional efforts, such as the preparation of an archaeological treatment plan, testing, and/or data recovery, may be warranted prior to allowing construction to proceed in this area.		X		City of Pasadena			
Geology and Soils								
Mitigation Measure GEO-1	Paleontological Monitoring. Prior to commencement of grading activity within Pleistocene-age alluvial deposits, the City shall retain a qualified paleontologist per the 2010 Society of Vertebrate Paleontology guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program for the project, which shall be consistent with the 2010 Society of Vertebrate Paleontology guidelines. The Paleontological Resources Impact Mitigation Program shall outline requirements for pre-construction meeting attendance and worker environmental awareness training, where monitoring is required within the project site based on construction plans and/or geotechnical reports, procedures for	X	X		City of Pasadena			

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	adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the pre-construction meeting and a paleontological monitor shall be on site during all rough grading and other significant ground-disturbing activities in previously undisturbed, fine-grained Pleistocene age alluvial deposits. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. Any costs for laboratory work and curation fees at an accredited fossil repository in case of fossil recovery are the responsibility of the City of Pasadena.							
Noise								
Mitigation Measure NOI-1	Temporary Construction Noise Abatement. The City shall install noise abatement during the project site improvements phase, strategically placed along (or within, as practical and appropriate) the eastern project site boundary where the SCE easement adjoins the off-site unincorporated LA County residence along Thorndale Road. Noise abatement shall be in the form of sound blankets or comparable temporary solid barriers to occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise sensitive receptor(s) of concern (i.e., where the line-of-sight is blocked). By way of example, suspended sound blankets, field-erected plywood sheeting, or comparable temporary solid or flexible but sufficiently massive barriers (of minimum sound transmission class [STC] rating of 25) would occlude construction noise emission between the site and the noise-sensitive receptor(s) of concern. During the project site improvements phase of construction, noise abatement in the form of sound blankets or temporary solid barriers must be at least 10-feet in height to achieve on-site noise control and sound abatement that would result in a minimum construction noise reduction of approximately 13 decibels (dB) at the unincorporated LA County residence along Thorndale Road, east of the Southern California Edison (SCE) easement within the project work limits. In addition to the noise abatement discussed above, the following measures should be considered as supplemental abatement strategies to sufficiently reduce construction noise emission:		X		City of Pasadena			

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	A. Implement administrative controls (e.g., reduce operating time of equipment and/or prohibit usage of equipment type[s] within certain distances to the nearest receiving occupied off-site property). B. Implement engineering controls (change equipment operating parameters [e.g., speed, capacity], or install features or elements that otherwise reduce equipment noise emission [e.g., upgrade engine exhaust mufflers]). Appendix F to this IS/MND includes a construction noise prediction worksheet that illustrates a sample scenario of what the anticipated and quantifiable noise reduction effect would be of adding a temporary 10-foot-tall noise barrier to reduce construction noise exposure at the unincorporated LA County residence along Thorndale Road. Such a wall should be strategically located on the eastern project boundary so as to reduce construction noise exposure by occluding direct line of sight between construction activities and the sensitive receptor of concern.							
Tribal Cultural Resources								
Mitigation Measure TCR-1	Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians–Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and	X	X		City of Pasadena			

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	burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. D. 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/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.							
Mitigation Measure TCR-2	Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural, and/or historic purposes.		X		City of Pasadena			
Mitigation Measure TCR-3	Unanticipated Discovery of Human Remains and Associated Funerary Objects or Ceremonial Objects. A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resources Code section 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.		X		City of Pasadena			

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