3200 East Foothill Boulevard Mixed Use Project

Mitigation Monitoring and Reporting Program

prepared by
City of Pasadena Planning & Community Development
175 North Garfield
Pasadena, California 91109

prepared with the assistance of
Rincon Consultants, Inc.
250 East 1st Street, Suite 301
Los Angeles, California 90012

June 2018

Rincon Consultants, Inc.
Environmental Scientists Planners Engineers
www.rinconconsultants.com

Mitigation Monitoring and Reporting Program

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the 3200 East Foothill Boulevard Mixed Use Project (proposed project) proposed in the City of Pasadena. The purpose of the MMRP is to ensure that the required mitigation measures identified in the Sustainable Communities Environmental Assessment (SCEA) are implemented as part of the overall project implementation. In addition, the MMRP provides feedback to agency staff and decision-makers during project implementation, and identifies the need for enforcement action before irreversible environmental damage occurs.

The following table summarizes the mitigation measures for each issue area identified in the SCEA for the proposed project. The table identifies the actions required for the measure to be implemented, the time at which the monitoring is to occur, the monitoring frequency, and the agency or party responsible for ensuring that the monitoring is performed. In addition, the table includes columns for compliance verification. These columns will be filled out by the monitoring agency or party and would document monitoring compliance. Where an impact was identified to be less than significant, no mitigation measures were required.

This MMRP will be used by City staff or the City's consultant to determine compliance with permit conditions. Violations of these conditions may cause the City to revoke the operating permit.

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
AIR QUALITY							
AQ-1 Construction Equipment Controls. During construction, all off-road construction equipment greater than 50 horsepower shall minimally meet U.S. EPA Tier 3 emission standards to minimize emissions of NOX associated with diesel construction equipment. Use of construction equipment that meets U.S. EPA Tier 4 emission standards shall be required for all bull dozers, backhoes, excavators, cranes, pavers, paving equipment, and rollers.	Field verify that construction equipment meets the applicable U.S. EPA Tier 3 or Tier 4 standard	Field verification during construction	Field verification periodically during construction	City of Pasadena Planning & Community Development Department			

SCAG RTP/SCS Mitigation Measure: MM-AIR-2(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible. CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions: ▪ Minimize land disturbance ▪ Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas ▪ Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes ▪ Cover trucks when hauling dirt ▪ Stabilize the surface of dirt piles if not removed immediately ▪ Limit vehicular paths on unpaved surfaces and stabilize any temporary roads ▪ Minimize unnecessary vehicular and machinery activities ▪ Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities ▪ On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications ▪ Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that	Review and verify that applicable and feasible measures to reduce construction-related air quality emissions are included in the final plans; Field verify that identified construction measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department

could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet

- Ensure that all construction equipment is properly tuned and maintained.
- Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway
- Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators
- Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through- traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites
- As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site
- Implement EPA's National Clean Diesel Program
- Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible

- On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity
- If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines
- Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines
- Convert part of the construction truck fleet to natural gas
- Include “clean construction equipment fleet”, defined as a fleet mix cleaner than the state average, in all construction contracts
- Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road)
- Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas
- Use diesel construction equipment meeting ARB’s Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation
- Use on-road, heavy-duty trucks that meet the ARB’s 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation
- Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary
- Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
subcontractors. The on-site construction manager shall enforce this limit ▪ Prohibit diesel idling within 1,000 feet of sensitive receptors ▪ Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors ▪ The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time ▪ The engine size of construction equipment shall be the minimum practical size ▪ Catalytic converters shall be installed on gasoline-powered equipment ▪ Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit ▪ Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite ▪ Use new or rebuilt equipment ▪ Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated ▪ Use low rolling resistance tires on long haul class 8 tractor-trailers ▪ Suspend all construction activities that generate air pollutant emissions during air alerts ▪ Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines							

Pasadena General Plan EIR Mitigation Measure: 2.1. Prior to issuance of any construction permits, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division. Mitigation measures to reduce construction-related emissions include, but are not limited to: ▪ Requiring fugitive-dust control measures that exceed SCAQMD's Rule 403, such as: ▪ Use of nontoxic soil stabilizers to reduce wind erosion ▪ Applying water every four hours to active soil-disturbing activities ▪ Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials ▪ Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower ▪ Ensuring that construction equipment is properly serviced and maintained to the manufacturer's standards ▪ Limiting nonessential idling of construction equipment to no more than five consecutive minutes ▪ Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website at	Review and verify the submittal of a Technical Assessment evaluating construction-related air quality impacts; If construction-related air quality impacts are determined to be significant, review and verify that applicable and feasible measures to reduce construction emissions are included in the final plans; Field verify that identified construction measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf							

Pasadena General Plan EIR Mitigation Measure: 2.2. Prior to future discretionary project approval, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project operation phase-related air quality impacts. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the Standard Conditions of Approval. Below are possible mitigation measures to reduce long-term emissions: ▪ For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plugin of the anticipated number of refrigerated trailers to reduce idling time and emissions. ▪ Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use. ▪ Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485). ▪ Site-specific development shall demonstrate that an adequate number of electrical vehicle Level 2 charging stations are provided onsite. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by the Building Division prior to issuance of a Certificate of Occupancy. ▪ Applicant-provided appliances shall be Energy Star appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances	Review and verify the submittal of a Technical Assessment evaluating operation-related air quality impacts; If operation-related air quality impacts are determined to be significant, review and verify that applicable and feasible measures to reduce operation emissions are included in the final plans; Field verify that identified operation measures are adequately implemented	Review and verification prior to project approval; Field verification prior to project occupancy	Review and verification once prior to project approval; Field verification once prior to project occupancy	City of Pasadena Planning & Community Development Department

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
shall be verified by the Building & Safety Division during plan check. ▪ Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Pasadena, Metro, and Foothill Transit to ensure that bus pads and shelters are incorporated, as appropriate.							

East Pasadena Specific Plan EIR Mitigation Measures: **Construction Measures** Although particulate emissions are not expected to be significant, the City shall require that all construction comply with SCAQMD regulations, including Rule 402 which specifies that there be no dust impacts off site sufficient to cause a nuisance, and SCAQMD Rule 403, which restricts visible emissions from construction. Specific measures to reduce fugitive dust that will be required for all construction projects in the Specific Plan area shall include the following: ▪ Moisten soil and debris piles prior to grading ▪ Water exposed surfaces at least twice a day under calm conditions and as often as needed on windy days when winds are less than 25 miles per day or during very dry weather in order to maintain a surface crust and prevent the release of visible emissions from the construction site ▪ Treat any area that will be exposed for extended periods with a soil conditioner to stabilize soil or temporarily plant with vegetation ▪ Wash mud-covered tires and under-carriages of trucks leaving construction sites ▪ Provide for street sweeping, as needed, on adjacent roadways to remove dirt dropped by construction vehicles or mud which would otherwise be carried off by trucks departing project sites ▪ Securely cover loads of dirt with a tight fitting tarp on any truck leaving the construction sites to dispose of excavated soil ▪ Cease grading during periods when winds exceed 25 miles per hour ▪ Provide for permanent sealing of all graded areas, as applicable, at the earliest practicable time after soil disturbance, and Contractors shall: ▪ Maintain construction equipment in peak operating condition so as to reduce operation emissions ▪ Use low-sulfur diesel fuel in all equipment ▪ Use electric equipment whenever practicable	Field verify that construction activity complies with applicable SCAQMD regulations regarding fugitive dust	Field verification during construction	Field verification periodically during construction	City of Pasadena Planning & Community Development Department

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
▪ Shut off engines when not in use for more than five minutes. The City shall specify that the proponents/applicants for future construction in the Specific Plan area use natural and pre-colored materials in construction to the extent feasible to minimize emissions of reactive organic compounds during painting and coating operations. **Operational Measures** There may be opportunities for traffic management programs, depending on future uses and ownerships. Potential emission reductions cannot be quantified at this time.							
BIOLOGICAL RESOURCES							

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
BIO-1 Nesting Birds. To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and CFGC, activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 30). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than 3 days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot inside the Project Boundary, including a 300-foot buffer (500-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within this buffer until the avian biologist has confirmed that breeding/ nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.	Verify that construction is scheduled outside of the bird breeding season; If construction is to occur during the bird breeding season, verify and review completion of a nesting bird survey and review survey results; If nests are found, field verify compliance with established buffer	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department			

SCAG RTP/SCS Mitigation Measure: MM-BIO-4(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and polices of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: ▪ Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur ▪ Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino ▪ Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement ▪ Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season ▪ Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible ▪ Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within	Review and verify that applicable and feasible measures to reduce project-related impacts to biological resources are included in the final plans; Field verify that identified biological preservation measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department

three days prior to the work in the area from February 1 through August 31

- Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors
- Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season
- Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDB by a qualified biologist to determine the risk of habitat fragmentation
- Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat)
- Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible
- Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation

project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern

- Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction
- Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas
- Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:
  - Wildlife movement buffer zones
  - Corridor realignment
  - Appropriately spaced breaks in center barriers
  - Stream rerouting
  - Culverts
  - Creation of artificial movement corridors such as freeway under- or overpasses
  - Other comparable measures
- Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions
- Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
(previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species ▪ Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas							

SCAG RTP/SCS Mitigation Measure: MM-BIO-5(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: ▪ Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources ▪ Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist ▪ If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species ▪ Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree ▪ Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing	Review and verify that applicable and feasible measures to reduce project-related impacts to biological resources are included in the final plans; Field verify that identified biological preservation measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department

ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree

- Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree
- Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration
- If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed
- Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations
- Design projects to avoid conflicts with local policies and ordinances protecting biological resources
- Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
▪ Avoidance strategies ▪ Contribution of in-lieu fees ▪ Planting of replacement trees at a minimum ratio of 2:1 ▪ Re-landscaping areas with native vegetation post-construction ▪ Other comparable measures							
Pasadena General Plan EIR Mitigation Measure: 3.3. The City of Pasadena shall require applicants of development projects to avoid potential impacts to sensitive or protected biological resources to the greatest extent feasible. Depending on the resources potentially present on the project site, avoidance may include: 1) establishing appropriate no-disturbance buffers around onsite or adjacent resources, and/or 2) initiating construction at a time when special status or protected animal species will not be vulnerable to project-related mortality (e.g., outside the avian nesting season or bat maternal or wintering roosting season). Consultation with relevant regulatory agencies may be required in order to establish suitable buffer areas. If the project avoids all sensitive or protected biological resources, no further action is required. If avoidance of all significant impacts to sensitive or protected biological resources is not feasible, the project shall implement Mitigation Measure 3.4.	Review and verify that applicable and feasible measures to avoid project-related impacts to biological resources are included in the final plans; Field verify that identified biological preservation measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
Pasadena General Plan EIR Mitigation Measure: 3.4. The City of Pasadena shall require applicants of design development projects to minimize potential impacts to sensitive or protected biological resources to the greatest extent feasible, in consultation with a qualified biologist and/or appropriate regulatory agency staff. Minimization measures may include 1) exclusion and/or silt fencing, 2) relocation of impacted resources, 3) construction monitoring by a qualified biologist, and 4) an informative training program conducted by a qualified biologist for construction personnel on sensitive biological resources that may be impacted by project construction. If minimization of all significant impacts to sensitive or protected biological resources is infeasible, the project shall implement Mitigation Measure 3.5.	If the avoidance of significant impacts to biological resources is not feasible, verify that the applicant consults with a qualified biologist and/or appropriate agency staff to reduce impacts to the greatest extent feasible; Field verify that identified biological preservation measures are adequately implemented	Verification prior to issuance of any construction permit; Field verification during construction	Verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
Pasadena General Plan EIR Mitigation Measure: 3.5. A qualified biologist will develop appropriate mitigations that will reduce project impacts to sensitive or protected biological resources to a less than significant level, if feasible. The type and amount of mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigations may include, but are not limited to: 1) compensation for lost habitat or waters in the form of preservation or creation of in-kind habitat or waters, either onsite or offsite, protected by conservation easement; 2) purchase of appropriate credits from an approved mitigation bank servicing the Pasadena area; and 3) payment of in-lieu fees.	If minimization of significant impacts to biological resources is infeasible, verify that a qualified biologist is obtained to reduce impacts to less than significant levels; Verify that identified biological preservation measures are adequately implemented	Verification prior to issuance of any construction permit; Verification during construction	Verification once prior to issuance of any construction permit; Verification periodically during construction	City of Pasadena Planning & Community Development Department			
CULTURAL RESOURCES							

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
CR-1 Recordation. The applicant shall be responsible for recordation of the site to the satisfaction of the City of Pasadena. Documentation shall include narrative text and selective photographs per HABS/HAER Documentation Level II, including large-format photographs of key illustrative views of selected features and written data describing the history and use of the resource. Documentation should also include reproduction of historic photographs, where available. Existing drawings, if available, should be photographed with large-format negatives or photographically reproduced on Mylar. Documentation shall be prepared by a qualified consultant who meets the Secretary of the Interior's Professional Qualifications standards in history and/or architectural history. Documentation shall be provided to the Library of Congress where it will be appropriately archived and publicly accessible and offered to U.S. Naval Museum of Armament & Technology at NAWS China Lake, the Navy's Space and Naval Warfare Systems Center Pacific, the Pasadena Public Library, and Pasadena Heritage. All photography of selected features shall be completed prior to the issuance of the first demolition permit issued by the City of Pasadena for removal of the buildings at the site. The balance of the HABS/HAER documentation shall be completed within 180 days following the issuance of said demolition permits.	Verify that a qualified consultant is obtained to prepare a documented recordation of the site; Review completed documentation and verify necessary information	Verification prior to issuance of any construction permit; Review after documentation completion	Verification once prior to issuance of any construction permit; Review once after documentation completion	City of Pasadena Planning & Community Development Department			

CR-2 Interpretive Program. The Applicant shall, in consultation with an expert in museum curation and/or the history of the United States Navy and armament program ("Interpretive Consultant"), develop information to be used in connection with an on- site interpretive project ("Interpretive Program"), interpreting and illustrating: ▪ The creative, engineering, manufacturing and administrative activities and events that took place and products developed at the Pasadena NOTS complex, ▪ How these activities and events were associated with national research, development and production efforts for the Navy and national defense, ▪ Innovations and products developed at the plant and how these important events contributed significantly to the larger defense effort. The Interpretive Program shall highlight significant innovations and products developed at the plant and show how these important events contributed significantly Pasadena's role in the national defense efforts. ▪ The Interpretive Program shall identify key individuals who worked at the site, their personal histories, credentials, roles and accomplishments related to the site. The Interpretive Program shall include publicly accessible displays placed or housed on the site and incorporated as part of any future use and development of that property (e.g., interpretative elements incorporated as part of publicly accessible open space features). Copies of the Interpretive Program shall also be provided to the Pasadena Public Library. The interpretive plan shall display four important historic elements on-site in a manner consistent with the 3200 E. Foothill Historical Elements Interpretive Plan as illustrated Appendix E and as described below: **Flagpole** The existing flagpole shall be retained and relocated to the Southeast corner of East Foothill Boulevard and the Santa Paula entrance into the project. As it is customarily used, it shall mark an important threshold into the property, and reinforce the notion of 'gateway'. It shall anchor a substantial public corner, and continue to be used as a functional flagpole connected with ongoing events with the project's public spaces.	Verify that the applicant consults with a qualified professional to develop an on-site interpretive program; Review completed program plans and verify necessary information; Field verify program implementation	Verification prior to issuance of any construction permit; Review after program completion; Field verify prior to project occupancy	Verification once prior to issuance of any construction permit; Review once after program completion; Field verify once prior to project occupancy	City of Pasadena Planning & Community Development Department

Anchor Symbol

Similar to the flagpole's placement, the anchor symbol shall be retained and relocated to the northern edge of the pedestrian plaza and paseo to the East of the Santa Paula entrance. Marking this secondary entrance into the project, the anchor symbol shall be mounted on a plinth to ensure its visibility, and appropriate stature.

Torpedo Monument

The existing monument base shall be reconstructed or relocated to a site within the planned central plaza space. The torpedo portion, which no longer exists, shall be recreated and added to the monument base. To expand the torpedo narrative, the complete monument shall reside within a shallow basin or sheet of water, reflecting the sky and the monument itself, and offering an appropriate level of reverence. The placement shall create a visual connection to the Variable Atmospheric Tank, as its visual connection is important given their historical functional relationship.

Variable Atmospheric Tank

The Variable Atmospheric Tank ("Tank") is comprised of three chamber segments and a crown. More than half of the lower segment is encased in concrete and not salvageable. All of the above-ground portions, as well as the crown, shall be salvaged and reconstructed in the center of the project site, and reside within a park space organized around the Tank itself. The Tank shall be placed upon an expansive square of crushed aggregate or perhaps lawn and ringed by a bosque of canopy trees. The Tank shall occupy a "public room" that forms a quiet contemplative space where the significance of the Tank and its role in U.S. Naval history can be appropriately conveyed.

Interpretive Information Distributed through Site

In addition to the four elements discussed above, a narrative trail taking on a variety of forms to connect these pieces of history shall be constructed. Tablets, markers or stones, or other displays shall be set within the paving or on-site to connect the four elements and shall be inscribed with discrete details to convey the site's significance.

Prior to issuance of a demolition permit, the City of Pasadena Planning Department shall review approve the Final Interpretive Program. The approval shall make the finding that the interpretive program is in substantial conformance with the

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
above described program elements. The interpretive program shall be publicly accessible and privately maintained by the project applicant, the successor in interest (if any), and/or the leasing entity.							

SCAG RTP/SCS EIR Mitigation Measure: MM-CUL-2(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: ▪ Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified. ▪ Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. ▪ Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: ▪ Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible.	Review and verify that applicable and feasible measures to reduce project-related impacts to historical resources are included in the final plans; Field verify that identified historical preservation measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department

	If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. ▪ Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. ▪ Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource. ▪ Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site. ▪ Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified. ▪ Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. ▪ If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property.	

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
▪ Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated. ▪ Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.							
Pasadena General Plan EIR Mitigation Measure: 4.1. If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.	If cultural resources are discovered on-site during construction, verify that construction activities are halted and the find is evaluated by a qualified archaeologist	Field verification during construction	Field verification periodically during construction	City of Pasadena Planning & Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
CR-3 (Pasadena General Plan EIR Mitigation Measure: 4.1). If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.	If cultural resources are discovered on-site during construction, verify that construction activities are halted and the find is evaluated by a qualified archaeologist	Field verification during construction	Field verification periodically during construction	City of Pasadena Planning & Community Development Department			
CR-5 Unanticipated Discovery of Paleontological Resources. In the event a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a qualified paleontologist in accordance with Society of Vertebrate Paleontology standards. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant, the paleontologist shall design and carry out a data recovery plan consistent with SVP standards (2010).	If paleontological resources are discovered on-site during construction, verify that construction activities are halted and the find is evaluated by a qualified paleontologist	Field verification during construction	Field verification periodically during construction	City of Pasadena Planning & Community Development Department			

SCAG RTP/SCS EIR Mitigation Measure: MM-CUL-1(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: ▪ Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. ▪ Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources. ▪ Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible: ▪ All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. ▪ Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique	Review and verify that applicable and feasible measures to reduce project-related impacts to paleontological resources are included in the final plans; Field verify that identified paleontological preservation measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP. ▪ Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. ▪ Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas. ▪ Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance. ▪ Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.							

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
Pasadena General Plan EIR Mitigation Measure: 4.1. If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.	If cultural resources are discovered on-site during construction, verify that construction activities are halted and the find is evaluated by a qualified archaeologist	Field verification during construction	Field verification periodically during construction	City of Pasadena Planning & Community Development Department			

SCAG RTP/SCS EIR Mitigation Measure: MM-CUL-4(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060 and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: ▪ In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. ▪ If any discovered remains are of Native American origin: ▪ Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. ▪ If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 48 hours after being allowed access to the site, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains	Review and verify that applicable and feasible measures to reduce project-related impacts to human remains are included in the final plans; Field verify that identified measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: ▪ The Native American Heritage Commission is unable to identify a descendent; ▪ The descendant identified fails to make a recommendation; or ▪ The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.							
HAZARDS AND HAZARDOUS MATERIALS							

SCAG RTP/SCS EIR Mitigation Measure: MM-HAZ-1(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: ▪ Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials ▪ Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible ▪ Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials ▪ Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project ▪ Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should	Review and verify that applicable and feasible measures to reduce impacts related hazardous materials are included in the final project plans; Field verify that identified construction and operation measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction; Field verification after project occupancy	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction; Field verification periodically after project occupancy	City of Pasadena Planning & Community Development Department

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: ▪ The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids ▪ The location of such hazardous materials ▪ An emergency response plan including employee training information. ▪ A plan that describes the manner in which these materials are handled, transported and disposed ▪ Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects ▪ Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction ▪ Avoid overtopping construction equipment fuel gas tanks ▪ During routine maintenance of construction equipment, properly contain and remove grease and oils ▪ Properly dispose of discarded containers of fuels and other chemicals							

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
HAZ-1. Any surface water remaining onsite in connection with historical research and development of weapons systems, in particular, water located in the anechoic tank within Building 5 and surface water reportedly present in Building 103, shall be properly characterized, i.e., water samples collected and analyzed for COCs by a state-certified laboratory. Analytical results will determine if the waste water will be classified as a non-hazardous or hazardous waste. Handling and transport of waste water shall be conducted in accordance with applicable local, state and federal regulations, including EPA RCRA (40 CFR Part 262), Federal and State OSHA, DOT, and DTSC (CCR Title 22).	Verify that any surface water remaining on-site is characterized and analyzed by a state-certified laboratory	Verification prior to issuance of any construction permit	Verification once prior to issuance of any construction permit	City of Pasadena Planning & Community Development Department			
HAZ-2. If, following installation of groundwater monitoring wells and deep soil analytical analysis for perchlorate required by the DTSC, and prior to final installation of landscaping and Low Impact Development measures, DTSC determines perchlorate is present in soil at concentrations that may pose a threat to groundwater, , then the applicant shall undertake measures that DTSC may require of the applicant to reduce water migration through the vadose zone resulting from irrigation and surface water infiltration to the satisfaction of DTSC and the City of Pasadena, such as implementing water conservation practices and requiring a review of the design for the stormwater capture and recharge associated with the low impact development measures.	If perchlorate is found to be present in on-site soil and a threat to groundwater, verify that the applicant undertakes measures to reduce water migration	Verification prior to project occupancy	Verification once prior to project occupancy	City of Pasadena Planning & Community Development Department			
HAZ-3. Contaminated soil and water generated during groundwater monitoring well installation and groundwater sampling activities shall be stored in appropriate waste containers, which shall be stored in a secured location such that residents will not come into contact with contaminated materials. Contaminated soil shall be stored in a roll-off bin or similar container, and water shall be stored in 55-gallon DOT-approved steel drums. Handling and transport of waste shall be conducted in accordance with applicable local, state and federal regulations, including EPA RCRA (40 CFR Part 262), Federal and State OSHA, Department of Transportation, and DTSC (CCR Title 22).	Verify that contaminated soil and water is stored in appropriate waste containers	Verification during groundwater monitoring well installation	Verification periodically during groundwater monitoring well installation	City of Pasadena Planning & Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
HAZ-4. Should future sampling events result in the installation of a groundwater remediation system onsite, the system shall be located in a locked compound such that residents will not come into contact with contaminated water or other materials used for remediation. Handling and transport of waste generated during the operation of the remediation system shall be conducted in accordance with applicable local, state and federal regulations, including EPA RCRA (40 CFR Part 262), Federal and State OSHA, Department of Transportation, and DTSC (CCR Title 22).	Verify appropriate siting and security of any groundwater remediation system installed on-site	Verification during groundwater remediation system installation	Verification periodically during groundwater remediation system installation	City of Pasadena Planning & Community Development Department			

SCAG RTP/SCS EIR Mitigation Measure. MM-HAZ-4(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Clean-up Act, and the Uniform Building Code, and County and City building standards, and all applicable federal, state, and local laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: ▪ Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects ▪ Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer ▪ Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action ▪ Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications,	Review and verify that applicable and feasible measures to reduce impacts related to project-placement on a hazardous materials site are include in the final project plans; Field verify that identified measures are adequately implemented	Review and verification prior to issuance of any construction permit; Field verification during construction	Review and verification once prior to issuance of any construction permit; Field verification periodically during construction	City of Pasadena Planning & Community Development Department

Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans

- Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building
- Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps
- Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency
- Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority
- Use best management practices (BMPs) regarding potential soil and groundwater hazards
- Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-

site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies

- Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building
- Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site
- Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction
- If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations
- Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law
- Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor,

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials ▪ Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials							
NOISE							
Pasadena General Plan EIR Mitigation Measure: 9.5. Prior to issuance of construction permits, applicants for new development projects within 500 feet of noise-sensitive receptors shall implement the following best management practices to reduce construction noise levels: ▪ Consider the installation of temporary sound barriers for construction activities immediately adjacent to occupied noise-sensitive structures. ▪ Equip construction equipment with mufflers. ▪ Restrict haul routes and construction-related traffic. ▪ Reduce nonessential idling of construction equipment to no more than five minutes. ▪ The identified best management practices shall be noted on all site plans and/or construction management plans and submitted for verification to the City of Pasadena Planning Division.	Review and verify that identified best management practices for construction noise reduction are included in the final project plans	Review and verification prior to construction permit issuance	Review and verification once prior to construction permit issuance	City of Pasadena Planning & Community Development Department			

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
N-1. Construction Equipment. Prior to the issuance of grading permits, the applicant shall submit the construction equipment list to the City's Planning and Community Development Department for approval. The Department shall enforce the following construction requirements: ▪ Large bulldozers (i.e., those greater than 312 horsepower) shall not be used for any construction activities (e.g., grading, building shell construction, or utility connection activities) within 420 feet of the Kaiser Permanente medical building to the east, 120 feet of the PCC Education Center and commercial uses to the north, and 225 feet of the single-family residences to the north. Instead, small bulldozers (i.e., those not exceeding 104 horsepower) or other similarly sized equipment shall be used, where necessary, within 420 feet of the Kaiser Permanente medical building, 120 feet of the PCC Education Center, and 225 feet of the single-family residences.	Review and verify the construction equipment list; Field verify small bulldozers are operated in lieu of large bulldozers at restricted locations	Review and verification prior to grading permit issuance; Field verification throughout construction	Review and verification once prior to grading permit issuance; Field verification periodically throughout construction	City of Pasadena Planning & Community Development Department			
N-2. Construction Vibration Monitoring Program. The applicant shall conduct on-site monitoring to ensure construction operations do not exceed the Caltrans vibration criteria reported in Table 7 of the Transportation and Construction Vibration Guidance Manual (2013). If vibration is found to approach the applicable standards, then additional measures shall be implemented to reduce vibration at impacted sensitive receptors to the maximum extent feasible. Examples of measures that may be implemented during project construction include, but are not limited to: ▪ Locating haul routes and truck loading operations at an effective distance from nearby sensitive receptors so as to reduce offsite vibration at these offsite buildings; and ▪ Phasing construction equipment operations to avoid simultaneous operation of equipment near sensitive receptor locations to reduce vibration levels.	Verify that an on-site vibration monitor is obtained; Field verify that monitor is on-site during ground disturbance	Verification prior to grading permit issuance; Field verification during ground disturbance	Verification once prior to grading permit issuance; Field verification periodically during ground disturbance	City of Pasadena Planning & Community Development Department			
TRANSPORTATION							

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
TRA-1 Transportation Demand Management Plan Strategies. To reduce the project's VT per capita, the applicant shall develop and implement Transportation Demand Management (TDM) Plan strategies that would reduce the project's vehicle trips by a minimum of 23%, as detailed below under Mitigation Measure TRA-1. Implementation of a TDM would also be in compliance with the mitigation measures stipulated in the East Pasadena Specific Plan EIR. Project strategies shall go beyond the City's Trip Reduction Ordinance (TRO) and shall include: ▪ Provide unbundled parking for residential uses ▪ Provide 275 Metro EZ passes for interested residents at 50% discount for five consecutive years from the issuance of the Certificate of Occupancy. If at the time of Certificate of Occupancy issuance, the Metro Board has expanded its employee-based "whole building" transit passes program to residential projects, the applicant shall purchase 575 annual passes and offer them to residents at 50% discount for five consecutive years from the issuance of the Certificate of Occupancy ▪ Complete various improvements at the bus stops serving the property, which may include sidewalk improvements, transit amenities, and the installation of BusFinders to improve accessibility and provide the real-time predicted arrivals of buses. The applicant shall coordinate the implementation of the improvements with the Transit Division of the City's Department of Transportation at the following transit stops: ▪ Westbound Foothill Boulevard/Santa Paula Avenue ▪ Eastbound Foothill Boulevard/Kinneloa Avenue ▪ Southbound Kinneloa Avenue/Foothill Boulevard; and ▪ Complete an annual TDM Survey beginning one year after the issuance of a Certificate of Occupancy for five consecutive years	Review and verify that TDM strategies are included in the final project plans; Coordinate with the applicant to implement bus stop improvements; Review and verify the submittal of an annual TDM Survey for five consecutive years beginning one year after project occupancy	Review and verification prior to project approval; coordination throughout project development; review and verification after project occupancy	Review and verification once prior to project approval; coordination periodically throughout project development; review and verification once every year for five years after project occupancy	City of Pasadena Planning & Community Development Department; City of Pasadena Department of Transportation			

SCAG RTP/SCS EIR Mitigation Measure: MM-TRA-1(b). Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency: ▪ Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation ▪ Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides ▪ Provide a vanpool for employees ▪ Fund capital improvement projects to accommodate future traffic demand in the area ▪ Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: ▪ Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement ▪ Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document) ▪ Signage and striping onsite to encourage bike safety ▪ Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals,	Review and verify that applicable and feasible transportation design measures are included in the final project plans; Field verify that identified transportation design measures are adequately implemented	Review and verification prior to building permit issuance; Field verification prior to project occupancy	Review and verification once prior to building permit issuance; Field verification once prior to project occupancy	City of Pasadena Planning & Community Development Department; City of Pasadena Department of Transportation

bulb outs, etc.) to encourage convenient crossing at arterials

- Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan
- Direct transit sales or subsidized transit passes
- Guaranteed ride home program
- Pre-tax commuter benefits (checks)
- On-site car-sharing program (such as City Car Share, Zip Car, etc.)
- On-site carpooling program
- Distribution of information concerning alternative transportation options
- Parking spaces sold/leased separately
- Parking management strategies; including attendant/valet parking and shared parking spaces
- Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas
- Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible
- Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services
- Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work

- Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs
- Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles
- Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions
- Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles
- Purchase, or create incentives for purchasing, low or zero-emission vehicles
- Create local "light vehicle" networks, such as neighborhood electric vehicle systems
- Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles
- Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles
- Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives

Project Selection

- Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability
- Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints

Public Involvement

- Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services

Transit and Multimodal Impact Fees

- Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations
- Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions

System Monitoring

- Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency

Arterial Traffic Management

- Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary

Signal Synchronization

- Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic

HOV Lanes

- Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions

Delivery Schedules

- Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas
- Implement and supporting trip reduction programs
- Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives

- Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities

Bicycle and Pedestrian Trails

- Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations

Bicycle Safety Program

- Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers
- Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects

Bicycle Parking

- Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists)
- Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:
  - Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation
  - Eliminate or reduce minimum parking requirements for new buildings
  - “Unbundle” parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space)
  - Use parking pricing to discourage private vehicle use, especially at peak times

▪ Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities ▪ Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times ▪ Encourage shared parking programs in mixed-use and transit-oriented development areas ▪ Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: ▪ Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking ▪ Encourage special event center operators to advertise and offer discounted transit passes with event tickets ▪ Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking ▪ Promote the use of bicycles by providing space for the operation of valet bicycle parking service **Parking "Cash-out" Program** ▪ Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use. **Pedestrian and Bicycle Promotion** ▪ Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. **Fleet Replacement** ▪ Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.				
SCAG RTP/SCA Mitigation Measure: MM_TRA-2(b). Consistent with the provisions of Section 15091 of the State CEQA	Review and verify that applicable and	Review and verification prior	Review and verification once	City of Pasadena

Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions: ▪ Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: ▪ Advocate for a regional, market-based system to price or charge for auto trips during peak hours ▪ Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation ▪ Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology ▪ Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation	feasible transportation design measures are included in the final plans; Field verify that identified transportation design measures are adequately implemented	to building permit issuance; Field verification prior to project occupancy	prior to building permit issuance; Field verification once prior to project occupancy	Planning & Community Development Department; City of Pasadena Department of Transportation

- Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay

- Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency:
  - A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes
  - Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur
  - Location of construction staging areas for materials, equipment, and vehicles at an approved location
  - A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit
  - Provision for accommodation of pedestrian flow
  - As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces
  - Any damage to the street caused by heavy equipment, or as a result of this construction, shall be

repaired, at the project sponsor's expense., within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, r Repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy

- Any heavy equipment brought to the construction site shall be transported by truck, where feasible
- No materials or equipment shall be stored on the traveled roadway at any time
- Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion
- All equipment shall be equipped with mufflers
- Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors
- Promote “least polluting” ways to connect people and goods to their destinations

- Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency:
  - Ensure transportation centers are multi-modal to allow transportation modes to intersect
  - Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail

- To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges
- Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations
- Coordinate schedules and routes across service lines with neighboring transit authorities
- Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles)
- Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so
- Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles
- Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets
- Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible

- Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including:
  - Ensure transit stops and bus lanes are safe, convenient, clean and efficient
  - Ensure transit stops have clearly marked street-level designation, and are accessible
  - Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate

    - Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one-half mile
- Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including:
    - Develop a Regional Pass system to reduce the number of different passes and tickets required of system users
    - Implement "Smart Bus" technology, using GPS and electronic displays at transit stops to provide customers with "real-time" arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service)
- Investigate the feasibility of an on-line trip-planning program
- Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including:
    - Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic
    - Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access
- Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including:
    - Designate a certain percentage of parking spaces for ride-sharing vehicles
    - Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles
    - Provide a web site or message board for coordinating shared rides

- Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit
- Hire or designate a rideshare coordinator to develop and implement ridesharing programs

- Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including:
  - Provide assistance to regional and local ridesharing organizations
  - Advocate for legislation to maintain and expand incentives for employer ridesharing programs
  - Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes
  - Provide public recognition of effective programs through awards, top ten lists, and other mechanisms
  - Implement a "guaranteed ride home" program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program
  - Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations
  - Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers
  - Work with existing shuttle service providers to coordinate their services
- Facilitate employment opportunities that minimize the need for private vehicle trips, including:
  - Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations
  - Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate
  - Enforce state idling laws for commercial vehicles, including delivery and construction vehicles

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
▪ Organize events and workshops to promote GHG-reducing activities ▪ Implement a Parking Management Program to discourage private vehicle use, including: ▪ Encouraging carpools and vanpools with preferential parking and a reduced parking fee ▪ Institute a parking cash-out program ▪ Renegotiate employee contracts, where possible, to eliminate parking subsidies ▪ Install on-street parking meters with fee structures designed to discourage private vehicle use ▪ Establish a parking fee for all single-occupant vehicles ▪ Work with school districts to improve pedestrian and bicycle to schools and restore school bus service ▪ Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities ▪ Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency ▪ Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers ▪ Synchronize traffic signals to reduce congestion and air quality ▪ Work with community groups and business associations to organize and publicize walking tours and bicycle evens ▪ Support legislative efforts to increase funding for local street repair							
TRIBAL CULTURAL RESOURCES							

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
TCR-1 Native American Monitoring. During ground-disturbing activities, a monitor meeting the satisfaction of the Gabrieleño Band of Mission Indians—Kizh Nation shall be present. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if Native American artifacts are found, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the Project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report, including site record to the City and the South Central Coastal Information Center at California State University, Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report. Subsequently, the find shall be turned over to the tribe. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources as determined by the monitor.	Verify that Native American monitor is obtained; Field verify that monitor is on-site during ground disturbance	Verification prior to grading permit issuance; Field verification during ground disturbance	Verification once prior to grading permit issuance; Field verification periodically during ground disturbance	City of Pasadena Planning & Community Development Department			

This page intentionally left blank.