

Agenda Report

TO: CITY COUNCIL

DATE: AUGUST 8, 2005

FROM: CYNTHIA J. KURTZ, CITY MANAGER

SUBJECT: AUTHORIZATION TO ENTER INTO A CONTRACT WITH ENVIRONMENTAL PLANNING ASSOCIATES TO PROVIDE PROFESSIONAL CONSULTING SERVICES IN THE PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE AMBASSADOR WEST PROJECT (AMBASSOR WEST CAMPUS)

RECOMMENDATION

It is recommended that City Council authorize the City Manager to execute a contract with Environmental Science Associates (ESA), for an amount not to exceed \$315,000, in the preparation of an EIR for the Ambassador West Project. Competitive bidding is not required pursuant to City Charter Section 1002 (F) for contracts for professional or unique services.

BACKGROUND

On the former West Campus of the Worldwide Church of God (Ambassador College), the AACP Properties, LLC (Dorn-Platz and Co., Sunrise Senior Living and Standard Pacific Homes) are proposing a development that will add 222 units in a senior life/care facility and 70 residential condominium units. A total of 147,000 square feet of administrative offices, educational buildings and other structures would be demolished to provide space for the 696,000 square feet of new construction. The project would involve about 2/3 of the block bounded by Orange Grove Blvd., Green St., St. John Ave., and Del Mar Blvd.

The development proposal envisions the following:

- 222 units in a senior life/care facility: Located along Green Street, this pair of six-story buildings with subterranean parking will contain 32 assisted living units for persons with Alzheimers or similar disabilities and 190 condominium units with varying levels of services.

- 70 residential condominium units: Located in four clusters on the westerly half of the block, these will be two- and three-stories in height with subterranean parking.
- Preservation and reuse of historic buildings as apartments or, in one case, offices.
- Preservation of significant landscape features and trees.

The proposed project is subject to the California Environmental Quality Act (CEQA) and an Environmental Impact Report (EIR) will be prepared. The Initial Study, to be circulated for public review and comment during the scoping process, will identify potentially significant environmental impacts for further analysis in the project EIR.

Staff distributed the Request for Proposals (RFP) to only one firm in this special instance. Environmental Planning Associates and its sub-consultants have already prepared EIR's on two previous development proposals on this site in the last five years. Since historic resources and tree protection issues are critical in this EIR and were fully analyzed in the two previous EIR's, staff determined that it was in the "best interest of the City" to hire the same firm for this third EIR. With a sole source process, the City is assured that the consultants with the most detailed knowledge of the site will prepare the EIR and the City saves the considerable time that would be required to solicit and evaluate multiple proposals. Furthermore, the City will be reimbursed for the costs of the contract, and the applicants agreed with this approach when it was proposed by staff.

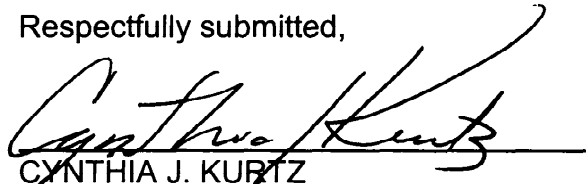
The EIR Proposal is for a budget of \$295,199.00. In the event that change orders become necessary and extra costs are incurred, staff recommends that a small contingency budget be added to the Council's authorization, resulting in the \$315,000 request.

The expected timeline for the project EIR for the Westgate Pasadena is seven months. The consultant's work is expected to commence in September, 2005.


FISCAL IMPACT

Consistent with City policy, the applicant will pay the full cost of preparing the Environmental Impact Report, including all consultant and staff expenditures. The applicant, AACP Properties, LLC, will deposit a check with the City in the amount of \$295,199.00 to cover the consultant costs in preparing the Environmental Impact Report, and the City will make progress payments as needed.

Respectfully submitted,


CYNTHIA J. KURTZ
City Manager

Prepared by:


Darrell Cozen
Senior Planner

Approved by:


Richard J. Bruckner
Director of Planning & Development

Attachment:

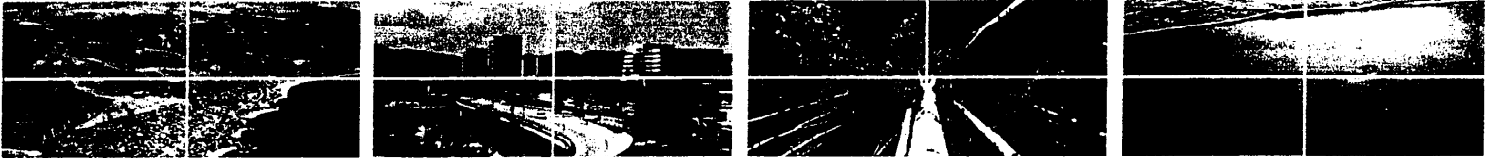
Excerpt of EPA Proposal

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Proposal For

**ENVIRONMENTAL PLANNING SERVICES
AMBASSADOR WEST PROJECT EIR**

July 1, 2005

PRESENTED TO:

City of Pasadena
Planning and Development Department
175 North Garfield Avenue
Pasadena, California 91109

Attn:
Darrell Cozen

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	Crain & Associates	
	SAIC	
	Dudek Associates	

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Environmental Planning Associates
Terry A. Hayes Associates
Myra L. Frank•Jones & Stokes
Crain & Associates
SAIC
Dudek Associates

A. PROJECT UNDERSTANDING

Statement from the Prime Consultant

This scope of work addresses preparation of a Draft EIR, Final EIR and all related documentation in accordance with the California Environmental Quality Act (CEQA) for the proposed Ambassador West senior housing and residential development on the former Ambassador College property in the City of Pasadena. Specifically, the scope addresses those tasks outlined in the Request for Proposal (RFP) to prepare a Draft and Final EIR to the satisfaction of the City's lead agency, the Department of Planning and Permitting, in accordance with California Environmental Quality Act Guidelines (CEQA) as amended January 1, 2005. The proposal is presented by EPA, as the prime EIR consultant and its technical team that includes Terry A. Hayes & Associates (TAHA), a Minority-owned Business Enterprise (MBE), Jones & Stokes, Crain & Associates, SAIC and Dudek Associates, as technical subconsultants.

This EIR team, led by Environmental Planning Associates, Inc. (EPA), is uniquely qualified to provide services for the Ambassador West senior housing and residential project. As the prime EIR consultant for the 1,942 unit East and West Campus development proposed by Legacy Partners, EPA, Inc., and later, the 1,431 units Worldwide Church of God/Shea Homes project, EPA possesses first-hand experience and a corresponding depth of knowledge regarding site characteristics, specific community issues and key concerns to involved City agencies. EPA has assembled key team members from these earlier efforts to ensure continuity for a planning process that began with adoption of the West Gateway Specific Plan (WGSP) in 1998, continued through 2001 with completion of the Draft and Final EIR for the Legacy project, and moved forward with subsequent plans by the Worldwide Church of God/Shea Homes project. This team will draw upon its prior role in the rigorous environmental review process for these projects to freshly address the issues facing the current proposal and identify an appropriate scope commensurate with the project's scale and density. This experience eliminates any technical learning curve and ensures that the EIR process can "hit the ground running" immediately upon contract authorization. Additionally, with few exceptions, physical conditions of the site have not appreciably changed since the Worldwide Church of God/Shea Homes project. EPA can quickly update its assessment of the site and proceed into an impact analysis mode, without extensive re-evaluation. Continuity, first-hand experience, exceptional technical expertise, site familiarity and community understanding - that is the core of the EIR team and is consistent with the City's objective to retain EPA as being in the best interest of the City.

Project Background and Understanding

Over the past five years, EPA has worked with the City of Pasadena in evaluating the effects of two prior proposals to develop the entire Ambassador College property, known as the East and West Campus. Development of these sites is a focal point for the West Gateway Specific Plan (WGSP), which was adopted in July 1998. In January 2000, Legacy Partners entered into a Development Agreement with the City to develop the East Campus with a technology-oriented office campus of 1,000,000 square feet (and 150 multi-family units) and the West Campus with 979 residential units. A Draft EIR was prepared by the EPA team (under the direction of the City's consultant) for the office campus proposal, but the applicant was unable to proceed with that program. Instead, the applicant sought to develop both the East and West Campuses with residential development totaling 1,942 units, which was addressed in the Draft EIR as an alternative. A Final EIR for the residential urban village project was completed in September of 2001. The project was further reduced in size to 1,727 units, but the EIR was never certified and in April of 2002, Legacy Partners formally withdrew its application with the City.

In July 2002, the Church selected Shea Homes to serve as a master development consultant and they assembled a development team. An RFP was issued by the City for EIR consultants to prepare the EIR

for that project and the EPA team was selected for the assignment. During the course of that project, the Worldwide Church of God and Shea Homes parted ways, and the Church elected to proceed with the project as the master developer. That project involved 1,431 units on both Campuses and possible demolition of the Ambassador Auditorium was addressed by the EIR. A Screencheck EIR was prepared by the EPA team, but was never approved, as the project was formally withdrawn in March of 2004.

Over the course of 2004, the Church sold the entire East Campus and portions of the West Campus. The East Campus is currently being proposed with development of 832 new units and the City has presumably completed their EIR consultant selection process. Portions of the West Campus were sold to Harvest Rock Church and Maranatha High School, including much of the lower, more modern part of the property which was developed for Ambassador College in the 1960s and 1970s. Maranatha High School will reoccupy several structures as a private high school (a CUP was recently approved for this use) and Harvest Rock Church is currently utilizing the Ambassador Auditorium for religious and cultural events. Some structures will be shared by both entities.

Later in 2004, remaining parcels were sold by the Church to Dorn-Platz & Company for development of senior assisted living units (continuing care, independent living units and assisted living) and new condominiums. Sunrise Senior Living and Standard Pacific Homes would serve as master development consultant to the project. Senior units would be developed along the Green Street frontage while new condominiums would be set back from Orange Grove Boulevard. A total of 70 new condominiums and 220 senior units would be developed under the project. The current project would also retain existing historic structures and open spaces within the site and would convert historic structures to residential units (Orange Grove Apartments, Grove Villas East and West) and to other uses (Terrace Villa, Manor Del Mar, Merritt House, Rankin House). New development would be within or below allowable densities on individual parcels and within WGSP height limits, however, proposed conversion of Rankin House to office uses may require an exception to the West Gateway Specific Plan and associated WGSP-1B zoning, unless otherwise accommodated by as yet to be identified provisions in the Zoning Code (Adjustment Permit). The project will also require a Conditional Use Permit and an Administrative transfer of Development Rights. Unlike previous proposals for the West Campus (which faced strong community opposition), the West Pasadena community appears to support the current proposal (per statements made to the Pasadena Star News – “what they are proposing looks like a winner” and “ending their five year fight”). This is likely attributable to several factors. First, senior units are very low trip generators compared to standard residential units, thereby reducing the overall trip generating effects of the project. Secondly, the total of new residential units is substantially less than with previous proposals. Lastly, much of the eastern or more contemporary part of the West Campus has been preserved and reoccupied by Maranatha High School and Harvest Rock Church, so total development of the West Campus would be significantly scaled back compared to earlier proposals.

While the project may not be well suited to a Mitigated Negative Declaration given the past history of the site, the predominant senior use and the limited amount of new residential units, may make it appropriate to focus the scope of the environmental review accordingly to those issues most relevant to the current project (including, but not limited to, traffic, historic resources, compliance with the City’s tree ordinance, air quality, noise, land use and aesthetics).

B. KEY EIR ISSUES AND GENERAL APPROACH

Overview of Team Approach

Our technical approach incorporates four years experience with the Ambassador site and our understanding of the community and City issues. The EIR team brings first hand experience in all

technical areas that will expedite preparation and analysis and avoid redundant tasks required for consultants who would otherwise have no previous site experience. Additionally, the proposed project is a discrete proposal limited to only part of the West Campus. The City is currently processing an EIR for an 832 unit residential project (Westgate) on the former East Campus to be developed by Sares-Regis. That project is being closely watched by the community and will likely be challenged. The Westgate EIR will also overlap with the Ambassador West EIR and it is essential that the latter project EIR both fully address the cumulative effects of the Westgate project and provide its own distinct separate analysis reflective of the smaller scale of proposed development. This includes ensuring consistency in overlapping data, where appropriate (existing traffic volumes, for example).

Upon City authorization, the EIR team's consultants would establish a new traffic study scope with the City's Transportation Planning and Development Division and initiate new counts, expand upon areas of previous historic resources analysis to address the current project and update the tree survey previously prepared for the site by Dudek Associates to assess the project's consistency with the tree ordinance. The EIR team will review the technical work completed to date in connection with the PAC submittal and other documentation as may be available from the project team, as well as with the prior projects, and will utilize these resources, as well as all relevant City documentation, to the fullest extent appropriate to minimize duplicative or conflicting information.

In order to expedite schedule and not duplicate work efforts, the EIR team encourages an open dialogue with the technical consultants already associated with the project including the project architect, developers, planners/designers, engineers, and other parties whose understanding of technical issues will prove beneficial to the EIR process. To the extent project studies have been completed, or existing team members are well suited to provide additional analysis, they should be available to the EIR team for inclusion in the EIR as may be appropriate.

The scope of the EIR will be determined upon completion of the Initial Study, however, given the reduced area and intensity of use compared to past projects, it is reasonable to assume that the scope of the EIR could be more limited than previous EIRs for the East and West Campuses. Clearly, the EIR for the current project must address traffic, historic resources, compliance with the City's tree ordinance, air quality and noise, and likely, land use and aesthetics. Other issues, such as public services, hazardous materials, drainage and water quality and population and housing, may or may not warrant detailed analysis in the EIR for the current project. For purposes of this proposal, analysis of all these areas is included, but can be excluded from the overall scope and cost upon further consultation with the City.

Key technical issues are summarized here.

Traffic and Circulation

Crain & Associates of Southern California led by George Rhyner will prepare the traffic and circulation study for the EIR. Crain will meet with the City's Transportation Planning and Development Division and Eric Shen, Planning and Development Manager, or Bahman Janka, Transportation Coordinator, upon contract authorization to formally establish the scope of work for the traffic study. Primary tasks for the study would be established as follows:

- Development of environmental setting, including field survey observations.
- Description of study area street system and available public transit serving the area including the ARTS bus and Gold Line connections.

- Calculations of existing traffic capacity and level of service at up to 20 intersections and 10 street segments (presumes City supplies existing counts at all locations).
- Research of related projects in the study area.
- Forecast of future traffic volumes at study intersections in the West Pasadena area.
- Analysis of future year traffic volumes for without project conditions at all study intersections for the proposed future study year.
- Project traffic generation estimates using appropriate trip generation rates (with credits/reductions for the removal/conversion of existing buildings, etc.).
- Trip distribution and trip assignment for project traffic.
- Determination of weekday peak hour project traffic impacts at study intersections for the project.
- Discussion of vehicular access to site parking and loading zones.
- Discussion of vehicular and pedestrian circulation within the site.
- Determine pedestrian and transit accessibility to the site including the ARTS bus and Gold Line accessibility.
- Analysis of freeway and regionally important intersection impacts, as required by the Los Angeles County Congestion Management Program (CMP).
- Discussion of project access, circulation and parking issues including determination of City Code parking requirements.
- If appropriate, also conduct a shared-parking or other demand analysis.
- Identification and description of recommended traffic mitigation measures (not including design).
- Recommendations and conclusions.

Per the RFP, the Department of Transportation has determined that the traffic study will not require modeling. The EIR team concurs with this approach as the advantages of a model driven analysis are not readily present for the scope and scale of the Ambassador West project. Alternatively, if City model runs for the study year were made available to the Ambassador West traffic consultant as well as a select zone run of the project, that data could be easily substituted for the manual analysis, if so requested by the City.

Additionally, count data for analyzed intersections common to both the Ambassador West and Westgate project traffic studies should be used to the extent approved by the City. This will ensure consistency for this portion of the two studies, as well as minimizing associated costs for both projects. *Based on consultation with Bahman Janka, Transportation Administrator, the City will supply existing count data for all 20 study intersections and all 10 street segments.*

Historic Resources

Jones & Stokes will update the historical resources inventory they prepared previously for the Legacy project and WCG/Shea Homes projects EIRs. The inventory prepared for the latter EIR in 2003 is still up to date for the major resources to be affected. However, in some cases, additional research for resources not fully evaluated in the 1997 West Gateway Specific Plan Historic Resources Survey may be needed (but only if they would be potentially affected by the proposed project). For example, the following resources may need further evaluation or clarification with regard to their historical significance: 1) the Rankin House Garage; 2) the Rankin House Interior; 3) the Grove Street pylons; 4) the Hulett Merritt House (Ambassador Hall) west façade, north façade, auto turnaround, and interior; and 5) the EDAW water feature and tempietto near the Jamison House (Terrace Villa).

In addition, the RFP specifically requested that the following 11 buildings previously not found to be historical resources be re-evaluated according to Section 15064.5(a) of the CEQA Guidelines because the West Gateway Specific Plan survey is now over five years old:

- Health Center (built in 1907)
- Landscape Custodial Building (1930)
- Villa Francesca Garages and Support Facility (1927)
- South Orange Grove Garages (1950)
- Library (1896)
- Library Annex (1899)
- Fine Arts Hall (1967)
- Science Hall (1967)
- Olcott House (1887)
- Television Facility (1961)
- Administration Hall (1969)

Other historical resources or EDAW elements may also need to be evaluated if their historical significance is not clear from earlier studies and if they would be affected by the proposed project. After all historical resources have been identified, Jones & Stokes will analyze the proposed project plans where work is proposed in the vicinity of historical resources or their historic character defining features. Any potential impacts and associated impacts will be identified. The impact criteria will follow those set forth in Section 15064.5(b) of the CEQA Guidelines, to determine if the proposed project would result in a substantial adverse change in the significance of a historical resource, or if proposed alterations and new construction are not significant because they follow the Secretary of the Interior's Standards for the Treatment of Historic Properties. Jones & Stokes will also develop mitigation measures, as necessary, in those cases where the project may result in a significant effect on a historical resource. Additionally, Jones & Stokes will provide architectural historians to attend meetings with the project team, City staff, City commissions, and preservation groups, including Pasadena Heritage, to assist with strategic historical resource issues, and to help interpret compliance with the Secretary of the Interior's Standards and Guidelines for Preservation of Historic Buildings (Standards).

Air Quality and Noise

Terry A. Hayes Associates (TAHA) will prepare an air quality impact assessment consistent with the requirements of the South Coast Air Quality Management District (SCAQMD) for both construction and operational impacts. The air quality impact assessment will entail: 1) Calculation of the daily emissions burden from construction and operational emissions. Emissions will be based on current US EPA, CARB, and SCAQMD approved emissions factors. Emissions will be compared to SCAQMD thresholds of

significance. 2) Calculation of carbon monoxide hot spots at intersections substantially affected by the project including poorly operating intersections as determined by the traffic study. The CAL3QHC model will be used to add project-related CO contributions to ambient concentrations derived from data collected at the Pasadena Air Monitoring Station on Wilson Avenue. Sensitive receptors, including the Special Children's Center on Green Street (adjacent to the West Campus), neighboring residences, and the proposed Maranatha High School adjacent to the site and internal to the West Campus, will also be analyzed for localized impacts. CO concentrations will be compared to State of California Ambient Air Quality Standards to determine significance. 3) Evaluation of consistency with the Air Quality Management Plan using SCAQMD criteria.

Construction noise levels will be predicted by monitoring selected locations and modifying those levels based on the estimated construction schedule, equipment, and specific activities. TAHA will use USEPA noise factors to estimate levels at sensitive receptor locations during the construction period. Up to 10 receptor locations will be selected in coordination with City staff. Previously identified sensitive locations include the Special Children's Center on Greet Street across from the project, the Harvest Rock Church and Maranatha High School adjacent to the site and internal to the West Campus, and neighboring residences. Using US EPA calculation procedures, construction noise levels will be compared to monitored baseline conditions to determine the potential change to ambient sound levels. Any incremental increase in sound levels at sensitive locations will be compared to the City Noise Element and Noise Ordinance to determine significance levels. Construction impacts will be addressed both as incremental changes to a typical daytime hour, and as incremental changes to the overall Community Noise Equivalent Level (CNEL). Incremental changes for both periods will be compared against City Noise Ordinance and Noise Element criteria to determine the significance of the change.

For operational impacts, TAHA will evaluate both mobile and stationary noise sources. Mobile noise will be evaluated using Sound 32, a Caltrans traffic noise prediction model that utilizes traffic volume and 3-dimensional Cartesian coordinate inputs. The model will be run with "no project" and "project" conditions to determine impacts at sensitive receptor locations along local streets that would be affected by the proposed project. TAHA will review project plans and identify stationary noise sources that may be of concern (mechanical equipment, HVAC systems, parking garages, etc.) All project-related noise contributions will be compared to established environmental impact criteria and City requirements to assess the significance of potential impacts. Where required, mitigation measures will be identified to eliminate or substantially reduce anticipated impacts. Stationary and mobile source impacts will be calculated on a 24-hour CNEL basis to be consistent with other City noise criteria.

Tree Ordinance Compliance

On May 5, 2002, the City of Pasadena adopted an ordinance amending the "City Trees and Tree Protection Ordinance." The ordinance was sparked by the interest of the community and government to preserve and grow the urban forest. In response to the ordinance (and for the WCG/Shea Homes EIR), the City directed EPA to solicit proposals from an arborist to prepare a comprehensive tree inventory for the entire Ambassador College property. The City selected Tom Larson, Principal of Dudek Associates, to conduct the inventory and Dudek Associates was retained by EPA for the WCG/Shea Homes EIR. It is our understanding that the inventory has been further updated by Dudek Associates in connection with the current proposed project and that the developer seeks to minimize the impact of the project on ordinance protected trees. Evaluation of the project's compliance with the tree ordinance is required to respond to Initial Study question IV.e (biological resources), would the project "conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?" Our team retains Tom Larson and Carolyn Schaffer of Dudek Associates, who will prepare an updated evaluation for inclusion in the EIR based on their extensive and current site experience and, if necessary, the survey will be updated. Specifically, the EIR will supplement prior efforts by providing a comprehensive narrative

discussion of existing trees on the property, an outline of the City's tree ordinance as an existing policy and a description of the trees on the site that will be subject to the ordinance. However, since the Ordinance is based on species and trunk diameter and the original survey was conducted in September 2002, an updated survey is warranted as part of the EIR scope of work. The project's compliance (or lack of) with the ordinance will then be used to determine the extent of any impact. This will include the total number of trees to be removed, relocated and preserved. Summary tables will be provided. Tree ordinance compliance requirements will be identified as mitigation and a determination will be made as to whether full compliance can be achieved, or whether mitigation reduces impacts to the ordinance to the fullest extent possible, but falls short of full compliance. *It is assumed that the development team or the City will provide geographically referenced digital files delineating project boundaries, building footprints, driveways, walkways, internal streets and all other landscaped areas, and that landscaped areas that overlie underground parking, basements, etc., will be similarly identified.*

Land Use

The proposed project would be built within the total density and height limitations of the WGSP for the Ambassador College property. However, the project will require a number of discretionary approvals to allow for uniform development of the project within the context of the Pasadena Municipal code. These approvals include a vesting tentative tract map, subdivision for condominium purposes, conditional use permit for senior units, lot line adjustments, transfer of development rights and a zoning adjustment permit to address areas potentially out of strict conformance with WGSP zoning. Additionally, the project will be required to comply with the City's inclusionary housing ordinance. The range of entitlements is not unusual for a project of this size and none of the approvals can be granted without a finding by the City's decisionmakers that such approvals are consistent with the General Plan. Nonetheless, the project may require an exception to the WGSP-1B zoning of the site to allow for the conversion of Rankin House to office uses (offices are only allowed in the WGSP 1C zone). Additionally, as discussed at a pre-proposal meeting with the City, proposed three-story buildings along the Orange Grove frontage would be out of conformance with two-story standards established by the zoning code. *The EIR team will look to the City's review of Appendix 6.9 of the PAC submittal, which provides a zoning consistency analysis for all aspects of the project. City comments relative to areas of consistency to the WGSP, City of Gardens and other standards and requirements will provide a sound basis from which to address associated land use policy impacts of requested entitlements.*

Aesthetics

The project would be built within the maximum height limitations identified by the WGSP and the densest development would be in scale with the Ambassador Auditorium in the northeastern part of the site. Given existing development and tall mature trees throughout the site, as well as the site's urban location, the project is not expected to obstruct previously available pedestrian level views of unique scenic vistas or resources from beyond the site boundaries (a CEQA impact standard). However, new development will expectedly change the existing visual character of the site, including the loss of numerous mature trees. Depending on the extent of tree removal and relocation, and final project design characteristics, it is possible that these changes could be considered a degradation of visual character, and as such, a potentially significant impact under CEQA. If the Initial Study determines that there could be a potentially significant impact, than an assessment will be included in the EIR. *It is presumed that the project architect would provide exhibits sufficient to convey the scaling, massing and character of the project as needed to support this analysis. Such exhibits may include project rendered photo montages, if so determined by the City and EPA.*

Hydrology

Should the Initial Study and consultation with City staff determine that a hydrology and drainage study is required for the EIR, SAIC will prepare the hydrology study/hydrologic analysis for the project. SAIC prepared a similar analysis for the WCG/Shea Homes EIR. For that analysis, SAIC worked with the project civil engineer who provided drainage calculations for the project. Based on these calculations, SAIC analyzed the existing draining patterns and quantity of runoff from the site and then prepared an analysis as to any changes to the quantity or location of runoff from the proposed project area, and the impact on City facilities. SAIC will call upon this same experience to prepare a revised analysis based on the current project. SAIC will review the June 2003 Fuscoe Engineering Hydrology Study for the West Campus area, and revise the runoff calculations for the new project boundary and conditions. Runoff estimates will be based on the most recent Los Angeles County Hydrology/Sediment Manual (2003) and current proposed land uses and topography (it is assumed that SAIC will be provided detailed land use information and that topographic information will be provided on a source map in AutoCAD). If a project specific drainage plan is not provided by the project civil engineer, SAIC will provide a proposed layout of a drainage system including pipelines and catch basins. It is assumed that SAIC will not be involved in the detailed design of the drainage system. The revised drainage study will also include a qualitative analysis of water quality impacts for both construction and operation, as well as an update of regional conditions (scheduled Total Maximum Daily Loads in the Los Angeles River watershed). Changes in drainage pattern, planned storm drainage and flood control systems, as well as changes in runoff quantities will be provided, as will any associated mitigation. Measures to reduce any water quality impacts will also be identified. *Should the project civil engineer provide drainage calculations for the project and existing conditions, the scope and cost of SAIC's effort would be reduced accordingly.*

Hazardous Materials

Extensive hazardous materials investigation was undertaken for the West Campus by Clayton Environmental Group as part of the prior two EIRs. Those evaluations found limited contamination below impactful levels requiring regulatory compliance, but a few areas require further remediation before construction can proceed. Such remediation will be required as part of the construction permitting process. Should it be determined that hazardous materials is an issue to be addressed in the EIR, no new analysis is considered warranted and EPA would incorporate the findings of the extensive assessments prepared between 2000 and 2003.

Utilities

Should it be determined that the EIR address infrastructure and utilities, EPA recommends that the project civil engineer provide service and capacity information as the basis for providing an assessment of current conditions. Although a sewer capacity analysis was conducted by the project engineer as part of the previous two EIRs, circumstances and conditions have likely changed and updated analysis may be needed. Using the project civil engineer is recommended, as that engineer will be most knowledgeable of the design requirements of the project and such analysis will be required as part of the developer's construction and design process, in any event. This will save costs of a duplicative effort and ensure that utility investigation truly reflects the specific design needs of the current project. *Consequently, the cost of such an investigation is not a part of this EIR proposal.*

C. SCOPE OF WORK

EIR Initiation and NOP Circulation

EPA will prepare an Initial Study to establish the scope of the EIR and reach consensus with the City. Upon completion of the Initial Study, the NOP will be prepared and circulated for a minimum of 30 days during which time the team will undertake relevant research and investigation and all technical tasks will be initiated. Once NOP responses are received the breadth of the EIR will be finalized for purposes of the first Screencheck EIR. The team will draw upon these comments to be as comprehensive in its analysis as possible and as is necessary to comply with the spirit and intent of the CEQA Guidelines. The team will identify key NOP issues, distribute technical assignments to team members and ensure that additional issues arising from comments are properly incorporated into the scope of work. Primary tasks are as follows:

- ✓ Project initiation meetings with City staff
- ✓ Prepare project description
- ✓ Prepare Initial Study
- ✓ Prepare NOP with newspaper ad versions
- ✓ File NOP with County Clerk and California Office of Planning and Research
- ✓ Coordination with City staff
- ✓ NOP responses and EIR issue identification

Technical Studies

All technical studies will be initiated while the Initial Study is being prepared. Detailed scopes and approaches for these studies are provided in Section I.B of this proposal. The following consultants will provide the EIR technical studies addressed in this proposal:

- Crain & Associates – Transportation and Circulation
- Jones & Stokes – Historic Resources
- SAIC – Hydrology
- Terry A. Hayes Associates – Air Quality and Noise
- Dudek Associates – Tree Ordinance Compliance

Additionally, studies as may be provided by the development team (such as a utility investigation provided by the civil engineer) should also be completed at this time.

All EIR team members have provided technical services with one or both of the prior development proposals and EIRs for the Ambassador College property. Key personnel and their roles for each of the technical studies are provided in Section D and Appendix A of this proposal.

EIR Preparation

The EIR will thoroughly assess the existing conditions for each environmental issue area identified by the Initial Study; establish and present significance thresholds; identify the short-term and long-term environmental impacts of the proposed project, and their level of significance before mitigation; recommend feasible mitigation measures to reduce the significance of the impacts; and, identify areas of unavoidable significant impacts after mitigation. All analysis will be prepared in accordance with the City of Pasadena's Environmental Guidelines (adopted October 2002) and the requirements of Article 9 ("Contents of Environmental Impact Reports") of the CEQA Guidelines (as amended January 1, 2005).

Draft EIR preparation tasks are broken down into three major efforts: 1) preparation of the EIR database and submittal of the Screencheck EIR to Planning and Development, the Transportation Division and the City Attorney for review; 2) incorporation of subsequent corrections and revisions to the satisfaction of these departments; and, 3) approval, reproduction and circulation of the Draft EIR. Database preparation consists of preparing each EIR section, including the management, review of and completion of each technical study and all associated agency research. Post-submittal tasks consist of responding to all City comments on the Screencheck EIR and subsequent versions until the City has approved the document for public notice and certification. Technical studies will be revised as needed, and any final changes to the technical approach, methodologies, conclusions, etc. will be addressed at this time.

For purposes of this proposal it is assumed that three development alternatives will be addressed including reduced density, a different land use mix and "no project". However, the identification of specific alternatives will be determined by the scope of the proposed project, consultation with Planning and Development, the Transportation Division and the City Attorney, and from NOP and scoping meeting comments as may be relevant. Final selected alternatives will meet the reasonable range requirement of Section 15126.6 of the CEQA Guidelines, including why the alternatives were selected and others were not considered. *It is also presumed that the project architect will be able to provide site plans for each of the selected EIR alternatives.* All other mandated sections including Project Description, Environmental Setting, Executive Summary, Growth-Inducing Impacts, Impacts Found to be Less Than Significant, and Cumulative Impacts shall be prepared consistent with the spirit and intent of the CEQA Guidelines.

Final EIR tasks involve preparation of responses to all Draft EIR comments and public testimony, including a comment matrix by issue; compiling all responses to comments with an introduction and summary for City submittal as a Screencheck Final EIR and revising the Screencheck Final EIR to the satisfaction of City of Pasadena reviewing departments. As comments are received on the Screencheck and new issues are raised, the information will be channeled to all team consultants. As with the Screencheck Draft EIR, technical studies will be revised if needed, and any final changes to the responses to comments and corresponding revisions to the Draft EIR will be addressed at this time.

For purposes of this proposal, it is assumed that approval of the Draft and Final EIRs will be accomplished in two City reviews (a primary review involving substantive comments and, an editorial review to ensure that all first review comments have been incorporated to staff satisfaction). Primary tasks are as follows:

- ✓ Preparation of all EIR sections and related technical analysis for the identified EIR sections
- ✓ Compilation of all analysis into the initial database
- ✓ Preparation of the first Screencheck EIR for review by the Planning and Permitting
- ✓ Revisions to the Screencheck EIR to the satisfaction of the Planning and Permitting
- ✓ Production and publication of the Draft EIR
- ✓ Prepare Notice of Completion and file with California Office of Planning and Research
- ✓ Mail Draft EIRs to City approved mailing list
- ✓ Review of all responses to the Draft EIR
- ✓ Preparation of responses to Draft EIR comments
- ✓ Preparation of the Screencheck Final EIR for review by Planning and Permitting
- ✓ Revisions to the Screencheck Final EIR to the satisfaction of the Planning and Permitting
- ✓ Production and publication of the Final EIR
- ✓ Mail Final EIRs to City approved mailing list

The team will be responsible for the mailing and noticing of all required CEQA documentation, including posting of the NOP, Notice of Completion and Notice of Determination (NOD) with the County Clerk and the State Office of Planning and Research.

The team will be mindful of Section 15088.5 of the CEQA Guidelines (concerning recirculation of an EIR prior to certification) in carefully documenting sources for conclusions and analyses to protect the administrative record and minimize any basis for recirculation. *This proposal assumes a maximum of 100 oral and written comments on the Draft EIR. Should this comment load be exceeded, then services would be billed hourly in accordance with key personnel standard billing rates.*

Mitigation Monitoring, EIR Findings and Statement of Overriding Considerations

This team will prepare a mitigation monitoring program per Section 15097 of the CEQA Guidelines. The program will be submitted for approval by the City and inclusion in the Final EIR. The program will identify the responsible party for implementation, monitoring timing and enforcement mechanisms for each identified measure. Additionally, the team will prepare EIR findings in accordance with Section 15091 of the Guidelines. The findings will provide and document and explain each of the significant unmitigated impacts identified in each EIR and will be presented in a “reader-friendly” manner that is not burdened by overly complex technical descriptions. A Statement of Overriding Considerations can also be prepared pursuant to Section 15093 of the CEQA Guidelines. The content, basis and approach for the Statement of Overriding Considerations will be determined upon completion of the Final EIR. The team encourages that the Statement of Overriding Considerations be developed by, or in concert with, Planning and Development staff and the City Attorney. Although the team can articulate the findings of the EIR, it is our opinion that articulating a jurisdiction’s political or economic priorities is a subjective task best suited to the agency itself, not the EIR consultant. *Consequently, the Statement of Overriding Considerations is not included within the EIR scope.*

Public Hearings/Project Meetings

Per the RFP, the following meeting and hearings are assumed for this EIR:

- (1) Public Scoping Meeting
- (6) Public Hearings

The above public hearing count assumes that there will be one Draft EIR public hearing and five project hearings including the Transportation Advisory Commission, the Design Commission, the Historic Preservation Commission, the Planning Commission and the City Council. Although a specific meeting load was not identified by the RFP, it did call out four milestone meetings. Therefore, this proposal presumes that prime EIR consultant (EPA) would attend up to 10 meetings and that primary subconsultants would attend four meetings (Terry A. Hayes Associates, Crain & Associates, Jones & Stokes and Dudek & Associates). Project meetings would address various technical and legal aspects of the EIR, provide regular status updates to the City and identify constraints, new issues or outstanding data needs. *Attendance at more meetings or by additional subconsultants as described here would be billed hourly in accordance with key personnel standard billing rates.*

Deliverables

The following deliverable work products are assumed to be provided for the project:

<u>Work Product</u>	<u>Number</u>
Screencheck NOP/Initial Study	1
Initial Study	30

Screencheck Draft EIR	10
Screencheck Draft EIR Appendices	6
Draft EIR Hard Copies	50
Draft EIR Appendices Hard Copies	30
Screencheck Preliminary Final EIR (Responses and Corrections)	10
Final EIR Hard Copies (Responses and Corrections)	70
Final EIR Hard Copies (Appendices)	25

Terry A. Hayes Associates will be responsible for conversion of all electronic files, as well as graphics, other exhibits and hard copy reports into .PDF files suitable for posting on the City of Pasadena's project web page, and other project websites, as may be appropriate. Terry A. Hayes Associates will work with the City's IT division to meet the desired specifications and formatting needs for on-line documents.

Assigned costs for these deliverables are provided in Section F, EIR Cost Proposal.

D. EIR TEAM AND KEY PERSONNEL

The EIR project team is led by Environmental Planning Associates, the prime consultant and includes up to five technical subconsultants who will prepare specific technical studies and provide other assistance for the EIR. All of the consultants were part of one or both prior EIR teams and will provide seamless continuity for the Ambassador West Project EIR. Specific consultants, their roles and key personnel are listed here. Please see Appendix A for resumes and project experience.

Environmental Planning Associates

James Brock, Principal-in-Charge
 Abbe Hoenscheid, Senior Planner
 Scott Debauche, Planner

- Project Management
- City Department Coordination
- Quality Control/Assurance
- Primary EIR Author
- Presentations
- Findings

Crain & Associates

George Rhyner, Senior Transportation Engineer
 Jonathan Louie, Senior Transportation Planner

- Transportation and Circulation Study
- Presentations

Jones & Stokes Associates

Richard Starzak, Principal
 Carson Anderson, Architectural Historian
 Jessica Feldman, Architectural Historian

- Cultural Resources Reevaluation

Terry A. Hayes Associates

Terry A. Hayes, Principal
 Madonna Marcelo, Senior Associate
 Teresa Li, Senior Planner

- Air Quality Study
- Noise Study
- EIR Preparation
- Presentations
- Public Notices
- Document Production

SAIC

Monica Hood, Project Manager
 William O'Brien, Engineer
 Matthew Brown, Engineer

- Hydrology Study
- Water Quality

Dudek Associates

Tom Larson, Principal
 Carolyn Schaffer, Environmental Planner

- Tree Ordinance Evaluation

An organization chart showing team structure and assignments for key personnel is shown on the following page.

E. SCHEDULE

This proposal presents an expedited schedule that would complete the EIR process in approximately 7 months. This is presented as an aggressive schedule that could be achieved under the best of circumstances (e.g., no additional analysis required from public comments, speedy review of the traffic study by Transportation and Development, no changes to the project description and a manageable EIR comment load). As such, the schedule should be viewed as a target subject to changing circumstances.

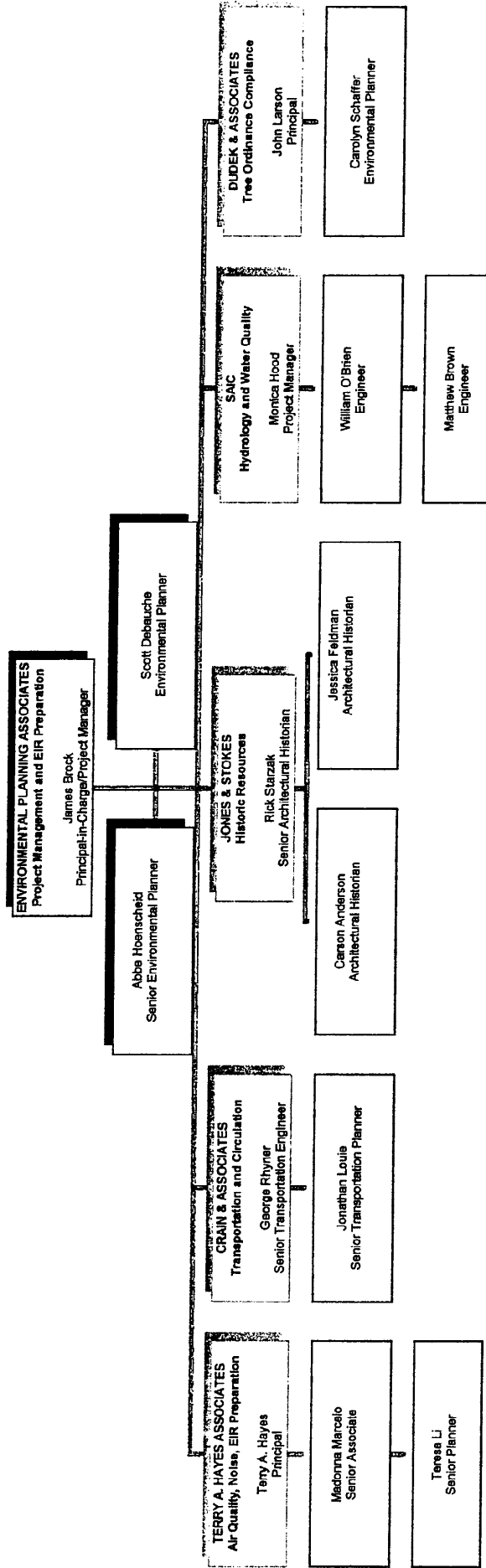
Key milestones for the EIR schedule are listed as follows, presuming authorization to proceed on August 22, 2005 as described by the RFP:

• Preliminary tasks and kick-off	August 22, 2005
• NOP Clearinghouse Submittal	September 16, 2005
• EIR Scoping Meeting	September 26, 2005
• NOP Circulation Ends	October 18, 2005
• Submit Screencheck Draft EIR	November 5, 2005
• Complete Draft EIR	December 3, 2005
• Draft EIR public hearing	December 14, 2005
• DEIR Circulation Ends	January 21, 2006
• Submit Screencheck Final EIR	February 11, 2006
• Complete Final EIR	March 18, 2006
• Final EIR 10-Day Availability period ends	March 29, 2006

Should the schedule be initiated subsequent to the assumed August 22, 2005 start date, milestone dates and completion time would be transposed to reflect a new start date.

The EIR team, including all subconsultants, is committed to meeting this schedule based on current and projected workloads and is available to begin work on the project immediately upon contract initiation. A detailed schedule showing milestones and task breakdown is also attached.

Ambassador West EIR Organization Chart



ID	Task Name	Duration	Start	Finish	August	September	October	November	December	January	February	March	April
1	CONTRACT AUTHORIZATION	0 days	Mon 8/22/05	Mon 8/22/05									
2	PHASE 1 PRELIMINARY TASKS	15 days	Mon 8/22/05	Mon 9/5/05	8/22								
3	Prepare Initial Study mockup	15 days	Mon 8/22/05	Mon 9/5/05									
4	Ascertain desired EIR scope with City	15 days	Mon 8/22/05	Mon 9/5/05									
5	Conduct new traffic counts	15 days	Mon 8/22/05	Mon 9/5/05									
6	Supplement historic resources inventory	15 days	Mon 8/22/05	Mon 9/5/05									
7	Revise tree inventory	15 days	Mon 8/22/05	Mon 9/5/05									
8	PHASE 2 PROJECT INITIATION AND SCOPING	41 days	Tue 9/6/05	Sun 10/16/05									
9	Complete Initial Study	7 days	Tue 9/6/05	Mon 9/12/05									
10	Prepare NOP and mailing	4 days	Tue 9/13/05	Fri 9/16/05									
11	Submit NOP to Clearinghouse	0 days	Fri 9/16/05	Fri 9/16/05									
12	Publish NOP and Initial Study to internet	4 days	Fri 9/16/05	Mon 9/19/05	9/16								
13	EIR scoping meeting	0 days	Mon 9/26/05	Mon 9/26/05									
14	NOP circulation period	30 days	Sat 9/17/05	Sun 10/16/05									
15	PHASE 3 PREPARE DRAFT EIR	93 days	Tue 9/6/05	Wed 12/7/06									
16	Prepare draft traffic study	30 days	Tue 9/6/05	Wed 10/5/05									
17	Prepare air quality and noise studies	30 days	Tue 9/6/05	Wed 10/5/05									
18	Prepare drainage analysis	30 days	Tue 9/6/05	Wed 10/5/05									
19	Complete revised historic analysis	30 days	Tue 9/6/05	Wed 10/5/05									
20	Determine tree ordinance compliance	30 days	Tue 9/6/05	Wed 10/5/05									
21	Determine tree ordinance compliance	30 days	Tue 9/6/05	Wed 10/5/05									
22	City review and approval of traffic study	14 days	Thu 10/6/05	Wed 10/18/05									
23	Identify and evaluate alternatives	14 days	Thu 10/6/05	Wed 10/18/05									
24	Prepare Screencheck DEIR	60 days	Tue 9/6/05	Fri 11/4/05									
25	City review	14 days	Sat 11/5/05	Fri 11/18/05									
26	Revise and prepare DEIR	14 days	Sat 11/19/05	Fri 12/2/05									
27	Print DEIR	5 days	Sat 12/3/05	Wed 12/7/05									
28	PHASE 4 DEIR CIRCULATION	45 days	Wed 12/7/05	Sat 1/21/06									
29	Submit DEIR and NOA to State Clearinghouse	0 days	Wed 12/7/05	Wed 12/7/05									
30	Publish DEIR to internet	3 days	Thu 12/8/05	Sat 12/10/05									
31	DEIR public hearing	0 days	Wed 12/14/05	Wed 12/14/05									
32	Required CEQA Circulation Period for DEIR	45 days	Thu 12/8/05	Sat 1/21/06									
33	PHASE 5 PREPARE FINAL EIR	71 days	Sun 1/22/06	Sun 4/2/06									
34	Prepare responses to comments	21 days	Sun 1/22/06	Sat 2/11/06									
35	City review	15 days	Sun 2/12/06	Sun 2/26/06									
36	Revise and prepare Screencheck FEIR	15 days	Mon 2/27/06	Mon 3/13/06									
37	Print FEIR	5 days	Tue 3/14/06	Sat 3/18/06									
38	Submit FEIR and NOC to Clearinghouse	0 days	Sat 3/18/06	Sat 3/18/06									
39	Publish FEIR to internet	3 days	Sun 3/19/06	Tue 3/21/06									
40	Final EIR availability period for comments	11 days	Sun 3/19/06	Wed 3/29/06									
41	Prepare findings and mitigation monitoring	15 days	Sun 3/19/06	Sun 4/2/06									



F. EIR BUDGET

Our costs include assignments of all key personnel, by hourly rate and/or by task. The total cost is based upon information about the project and the scope of work as conveyed to the EIR team at this time and is inclusive of all activities necessary to successfully complete the CEQA process. A master budget is provided that identifies costs for each EIR team consultant. Detailed costs for individual consultants are also provided in Appendix B. Given the level of community interest, it is appropriate to identify contingencies and limitations which could impact these costs. Based on the scope of services addressed herein, our budget for preparation of the Draft and Final EIR and associated CEQA documentation is \$272,068 with an additional \$23,131 estimated for mailing, printing and other direct expenses. Services will be billed monthly on a percent complete basis in accordance with all attached rates.

The cost for preparation of the Ambassador West Project EIR is subject to change, should there be significant changes to the scope of work, including but not limited to, the following:

- Meeting attendance in excess of 10 meetings for EPA and 4 meetings for EPA subconsultants, and an average of 2 hours per meeting (a total of 20 and 8 hours, respectively). Meeting attendance above and beyond this amount will be billed in accordance with the firms' respective hourly rates.
- Attendance in excess of 6 EIR/public hearings, assuming 4 hours each (a total of 24 hours for each attending consultant). Attendance above and beyond this amount will be billed in accordance with the firms' respective hourly rates.
- A new utility investigation is required in the event the City does not allow use of the investigation prepared by the project's civil engineer.
- Written and oral comments on the Draft EIR that exceed 100 total hours of response for EPA, 20 total hours response from Crain & Associates, 20 hours of response from Jones & Stokes Associates, 12 hours of response for Dudek & Associates, Terry A. Hayes Associates and SAIC.
- Printing, mailing and other direct costs in excess of the budgets shown in this cost proposal. Actual costs may vary based on the number of color graphics, size of the document, etc., as well as any additional copies above and beyond the amount identified.
- Project description changes after the NOP that impact EIR analysis including project density, land use mix or building footprints (relative to desirable trees, historic resources or viewlines and other potential impacts), that require revision to analyses already underway.
- An expanded EIR scope (e.g., new areas of impact not identified by the RFP or proposal) requiring new areas of analysis from EIR scoping meetings, NOP circulation or Draft EIR circulation.
- Additional technical studies not identified here (traffic, air quality, noise, historic resources, hydrology, tree ordinance).
- An expanded traffic study beyond 20 intersections, 10 street segments and 3 alternatives and/or City does not provide existing count data for study intersections and street segments.
- Other City requirements as may be imposed after contract authorization that could expand the technical scope.

- Additional services should the EIR be legally challenged.
- Additional analysis required due to changes or revisions to the CEQA Guidelines that occur prior to certification of the EIR.
- More than two reviews assumed for each of the Screencheck Draft and Final EIRs (primary submittal draft and editorial review).

AMBASSADOR WEST PROJECT EIR BUDGET							
TASK/FIRM							
PROJECT MEETINGS¹	\$3,300	\$2,696	\$2,340	\$2,300		\$1,400	\$12,036
EIR INITIATION							
NOP/Initial Study	\$8,160			\$1,800			\$9,960
Scoping Meeting	\$1,060	\$1,028	\$780	\$900	\$481	\$700	\$4,949
Subtotal	\$9,220	\$1,028	\$780	\$2,700	\$481	\$700	\$14,909
DRAFT EIR							
Screencheck EIR	\$51,300	\$9,710	\$5,280	\$3,100	\$5,879		\$75,269
Draft EIR preparation	\$9,340	\$14,232	\$6,180	\$700	\$1,449		\$31,901
Draft EIR Comment Meeting	\$1,060	\$1,028	\$780	\$900	\$481	\$700	\$4,949
Subtotal	\$61,700	\$24,970	\$12,240	\$4,700	\$7,809	\$700	\$112,119
TECHNICAL STUDIES							
Traffic Study ²				\$15,700			\$15,700
Revised Historic Resources ³			\$11,180				\$11,180
Air Quality and Noise		\$16,180					\$16,180
Tree Ordinance Analysis						\$14,030	\$14,030
Hydrology					\$5,273		\$5,273
Subtotal		\$16,180	\$11,180	\$15,700	\$5,273	\$14,030	\$62,363
FINAL EIR							
Public Hearings ⁴	\$3,300	\$5,140	\$3,900	\$7,100	\$2,515	\$3,500	\$25,455
Responses to Comments ⁵	\$11,625	\$1,388	\$2,940	\$7,000	\$1,587	\$2,620	\$27,160
Final EIR	\$7,160		\$2,925		\$1,589		\$11,674
Mitigation Monitoring	\$2,140						\$2,140
Findings of Fact	\$1,460						\$1,460
Subtotal	\$25,685	\$6,528	\$9,765	\$14,100	\$5,691	\$6,120	\$67,889
NOTICES		\$2,752					\$2,752
TOTAL	\$99,905	\$54,154	\$36,305	\$39,500	\$19,254	\$22,950	\$272,068

EPA = Environmental Planning Associates, TAHA =Terry A. Hayes Associates, JSA = Jones & Stokes.
 All costs subject to contingencies and limitations identified in this proposal.
¹ Maximum of 10 meetings for EPA, and 4 meetings for subconsultants and an average of 2 hours per meeting. Meeting attendance above and beyond this amount will be billed in accordance with the firms' respective hourly rates.
² Traffic study assumes 20 intersections, 10 street segments and 3 alternatives, with City providing counts for all intersections and segments.
³ Revised survey. Revised impact findings and project assessment appear under Draft EIR.
⁴ Should the project civil engineer provide drainage calculations, this cost would be eliminated.
⁵ Maximum of 5 hearings, assuming 4 hours each. Attendance above and beyond this amount will be billed in accordance with the firms' respective hourly rates.
⁶ Responses to Comments in excess of allotted budget would be billed in accordance firms' respective hourly rates.

EIR PRINTING BUDGET			
Deliverable	Amount	Unit Cost	Total Cost
Screencheck NOP/Initial Study	1	\$15	\$15
Initial Study	30	\$15	\$450
Screencheck Draft EIR	10	\$65	\$650
Screencheck Draft EIR Appendices	6	\$75	\$450
Draft EIR - Hard Copies	50	\$65	\$3,250
Draft EIR Appendices - Hard Copies	30	\$65	\$1,950
Screencheck Final EIR	10	\$85	\$850
Final EIR - Hard Copies	70	\$85	\$5,950
Final EIR Appendices - Hard Copies	25	\$75	\$1,875
TOTAL PRINTING COSTS			\$15,440

TOTAL DELIVERABLES BUDGET					
TASK/FIRM	EA	TAB	SA	DR	OT
DELIVERABLES					
CEQA Notices and Mailing		\$5,000			\$5,000
Printing ¹	\$15,440				\$15,440
Other Direct Expenses	\$1,500	\$250	\$541	\$400	\$2,691
Subtotal	\$16,940	\$5,250	\$541	\$400	\$23,131
¹ Estimate only based on printing budget as shown on attached table. Actual costs may vary based on the number of color graphics, size of the document, etc.					

Please note, costs can also be adjusted, should the City and the EIR team determine that some areas of environmental impact can be addressed in the Initial Study and do not require full EIR analysis. Similarly, direct costs, such as postage or printing, can also be assumed by the City and therefore, deducted from the budget as mutually agreed to. Meeting and public hearing load can also be adjusted to reduce the budget. Should the City provide traffic counts for more than 6 intersections (as assumed by the proposal), costs of these counts could also be reduced.

As with previous contracts between the City of Pasadena and Environmental Planning Associates, billing would occur on a monthly basis. Invoices would be submitted with budget monitoring and hourly breakdowns for each team member.