

be less than with the proposed Project because it would be limited to 2,000 hours. Therefore, Alternative 2 would have air quality impacts similar to the proposed Project.

Under Alternative 2, only the operational parameters for proposed Unit GT-5 would change and all construction activities proposed as part of the Project would also occur. As such, Alternative 2 would have the same potentially significant, but mitigable, impacts on archaeological and paleontological resources, and impacts would be comparable to those of the proposed Project. Under Alternative 2, the Glenarm Building would still be designated as an essential facility, and the associated seismic upgrades to the building would still be undertaken. The seismic upgrades and removal of the boilers would result in significant, although mitigable, impacts on historical resources. Under Alternative 2, impacts to cultural resources would therefore be comparable to those of the proposed Project.

Under Alternative 2, PWP would maintain the same operating capacity compared to the proposed Project; however, it would be prohibited from using the new Unit GT-5 in excess of 2,000 hours per year. The proposed Project would be permitted to operate for up to 8,760 hours per year, and Alternative 2 would result in a loss of operational flexibility and system reliability. As a result, compared to the proposed Project, on-site annual GHG emissions resulting from Alternative 2 would be reduced compared to the proposed Project and current operations. Therefore, Alternative 2 would not result in a cumulatively considerable contribution to cumulatively significant impacts.

Alternative 2 would change only the operational parameters of the proposed Project by reducing the number of permitted hours of operation of proposed Unit GT-5. All Project components proposed under the Project would be constructed under Alternative 2, and therefore, construction activities including demolition, abatement of hazardous materials including ACMs and LBP, and remediation of on-site contaminated soils would take place, as under the proposed Project. Impacts with respect to hazardous materials would be potentially significant but mitigable, and therefore, comparable to those of the proposed Project.

Alternative 2 would result in similar significant and unavoidable impacts with respect to land use as compared to the proposed Project. The 125-foot OTSG stack associated with proposed Unit GT-5 would exceed the maximum 56-foot height limit for the Project site under existing zoning, and the proposed employee parking lot south of the Glenarm Building would conflict with the South Fair Oaks Specific Plan development standards requiring the placement of parking lots between the main building and the rear property line for new development on Fair Oaks Avenue, or along the property line perpendicular to Fair Oaks Avenue. There is no feasible mitigation to reduce the impacts associated with the stack height to a less than significant level and, at the time the Draft EIR was prepared, no feasible mitigation to address the location of the

employee parking lot existed. Therefore, impacts under Alternative 2 would remain significant and unavoidable and comparable to those of the proposed Project.

Under Alternative 2, with respect to noise, the same amount of construction would take place as under the proposed Project. The proposed Project was determined to result in less than significant construction or operational noise impacts, and impacts under Alternative 2 would be slightly reduced compared to the proposed Project, since Unit GT-5 would operate a reduced number of hours annually.

Under Alternative 2, proposed rehabilitation of the Glenarm Building interior to house City employees and seismic upgrades for essential facility designation of the Glenarm Building would take place as under the proposed Project.

The proposed Project was determined to result in less than significant impacts with respect to water consumption. Therefore, water consumption under Alternative 2 would be slightly reduced compared to the proposed Project, since Unit GT-5 would operate a reduced number of hours annually.

Alternative 2 would improve local generation reliability and increase the City's ability to generate power locally, but would do so to a considerably lesser degree than the proposed Project. With respect to support and implementation of the IRP, Alternative 2 would replace the existing Unit B-3 with a more efficient unit, but would limit its hours of operation and therefore only partially achieve this Project Objective. Limitations on the operating hours would reduce the City's ability to provide for mandated capacity to generate power when required by the CAISO, and therefore, Alternative 2 would only partially achieve this Project Objective. Similarly, the limitations on operating hours would only partially achieve the Project Objective of helping PWP reduce reliance on coal power.

Alternative 2 would achieve the Project Objectives pertaining to rehabilitation of the Glenarm Building and repurposing it as viable work space for City employees, and designating the Glenarm Building as an essential facility, since only power generation operational parameters would be changed under this alternative. Alternative 2 would still achieve the Project Objective of consolidation of new administrative offices, control stations, maintenance facilities, and public and shared space, but it would not maximize the use and efficiency of the facility, since the facility would lose operational flexibility due to the limitations on the operating hours of proposed Unit GT-5. The unit would be prohibited from operating in excess of 2,000 hours per year, even in the case where GT-5 would be the most efficient means of providing power to the City and its customers. Under this condition, PWP could be forced to import power, which could potentially result in an increase in the facility's GHG emissions over existing conditions.

As a result, the Alternative 2 would only partially achieve the Project Objective of maximizing the use and efficiency of the facility.

In summary, Alternative 2 would reduce one of the significant and unavoidable Project impacts (GHG emissions), would only partially achieve the underlying Project purpose of increased reliability of local power generation, and would partially achieve six Project Objectives and fully achieve two Project Objectives.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 2 as infeasible, which would justify rejection of Alternative 2.

#### D. ALTERNATIVE 3 – PROJECT SITE RECONFIGURATION ALTERNATIVE

##### 1. Summary of Alternative

Alternative 3 assumes that proposed Unit GT-5 would be constructed on the Glenarm Plant in the same location as under the proposed Project, directly south of the Glenarm Building. However, instead of constructing centralized administrative facilities/control stations/maintenance facilities/public and shared space within the Glenarm Building that would serve existing Units GT-1 through GT-4 and proposed Unit GT-5, existing administrative facilities and the B-3 control room on the Broadway Plant would continue to support existing and proposed power generation units on the Glenarm Plant. The 45-space employee parking lot proposed south of Unit GT-5 and fronting on Fair Oaks Avenue under the Project would not be constructed, since there is no other area on the plant site large enough to accommodate the required number of parking spaces. PWP employees would continue to share the City-owned lot leased to and used by Jacobs Engineering on the southeast corner of Glenarm Street and the Arroyo Seco Parkway.

The Glenarm Building would not be designated as an essential facility/Occupancy Category IV building, as under the proposed Project, and the seismic upgrades to current State Building Code Standards required for this designation would not be undertaken. Abatement of ACMs and LBP associated with the Glenarm Building would not be undertaken, since no reuse and occupancy of this building would occur under Alternative 3. Moreover, it is likely that the installation of Unit GT-5 would prevent future seismic upgrades of the Glenarm Building and preclude future designation as an essential facility, since its location immediately south of the Glenarm Building would effectively block future access to the building's interior for the heavy equipment needed for such upgrades. The Pump Building on the one-acre parcel south of State Street would still be expanded and renovated to serve as a mechanical shop to support the maintenance team for the entire Power Plant, housing general maintenance, machine

work, welding, and storage, and the associated 14-space employee parking lot on this parcel would still be constructed. See pages 5-27 to 5-31 of the Draft EIR.

## 2. Reasons for Rejecting Alternative

Under Alternative 3, none of the proposed interior rehabilitation of the Glenarm Building to house City employees, seismic upgrades required for essential facility designation, or demolition of exterior Glenarm Building features as proposed under the Project would be implemented, since existing administrative facilities and the B-3 control room on the Broadway Plant would continue to support power generation units on the Glenarm Plant. Unit GT-5 would still be installed south of the Glenarm Building and would partially block views of the building from off-site vantages. The Pump Building on the parcel south of State Street would still be expanded and improved for use as a maintenance facility. Although impacts on aesthetics were determined to be less than significant under the proposed Project, impacts under Alternative 3 would nonetheless be incrementally reduced compared to the proposed Project. However, it should be noted that the Glenarm Building would remain in its current deteriorating state, and would be vulnerable to substantial damage in the event of a major earthquake.

The proposed Project was determined to result in less than significant construction and operational air quality impacts. Under Alternative 3, construction-related air quality impacts would be reduced compared to the proposed Project since the amount of construction would be reduced. However, Unit GT-5 would operate as under the proposed Project, and operational air quality impacts would therefore be comparable to those of the Project.

Under the Alternative 3, a smaller area would be subject to grading and excavation, and therefore, there would be reduced impacts on archaeological and paleontological resources, as compared to the proposed Project. Under Alternative 3, the seismic upgrades required for designation of the Glenarm Building as an essential facility would not take place, and as such, there would be no impact on historical resources. While the proposed Project includes mitigation measures that would reduce these impacts to a less than significant level, under Alternative 3, the proposed administrative/control room facility, maintenance facilities, and shared and public space would not be constructed and no seismic upgrade of the Glenarm Building would take place. However, it should be noted that the proposed Project would comply with the most current building codes, would arrest the ongoing deterioration of the building, and could increase the ability of the Glenarm Building to withstand a major earthquake. Accordingly, under Alternative 3, the Glenarm Building could remain vulnerable to substantial damage in the event of a major earthquake.

Under Alternative 3, there would be no construction in the Glenarm Building, and the existing B-3 Control Room would instead be retrofitted with a control station to support operations of Unit GT-5. As such, the duration and intensity of construction under Alternative 3 would be reduced compared to the proposed Project, which would result in an incremental reduction in GHG emissions from construction equipment. Alternative 3 assumes installation of the same power generation equipment (i.e., Unit GT-5) as the proposed Project, and it would operate for the same number of permitted operating hours (8,760). Therefore, GHG emissions from operation of Unit GT-5 would be significant and unavoidable at the Project and cumulative levels, and the associated impacts of Alternative 3 would be comparable to those of the proposed Project.

Under Alternative 3, Unit GT-5 would still be constructed in the same location as under the proposed Project, and therefore remediation of contaminated soils determined to be present would still be necessary. However, since no new employee parking lot would be constructed south of Unit GT-5, the volume of contaminated soils to be remediated would be potentially reduced compared to the Project. Under Alternative 3, no new facilities would be constructed in the Glenarm Building, and no abatement of ACMs or LBP within the Glenarm Building would be required. The ACMs and LBP exist elsewhere on the Plant site and would still require abatement under Alternative 3. Impacts with respect to hazardous materials, including contaminated soils, ACMs, and LBP, would therefore be significant but mitigable under both the proposed Project and Alternative 3, but would be incrementally reduced under Alternative 3 because of the reduced scope of construction-related remediation and abatement.

Under Alternative 3, proposed Unit GT-5 would be constructed in the same location as under the proposed Project, south of the Glenarm Building on the Glenarm Plant. Consequently, Alternative 3 would still introduce a 125-foot OTSG stack to the Project site, which would exceed the height limitation under existing zoning, comparable to the proposed Project. A variance from the height restriction specified in the Zoning Code would be required, as under the proposed Project. However, the 45-space employee parking lot proposed south of Unit GT-5 and fronting on Fair Oaks Avenue would not be constructed. With elimination of this Project component, Alternative 3 would fully comply with the South Fair Oaks Specific Plan Development Standard, and no variance would be required. Overall, land use impacts under Alternative 3 would be reduced compared to the proposed Project.

Although construction and operational noise impacts under the proposed Project were determined to be less than significant, impacts under Alternative 3 would still be incrementally reduced compared to the proposed Project, since the amount of construction would be reduced.

Although water supply impacts under the proposed Project were determined to be less than significant, impacts under Alternative 3 would still be very slightly reduced compared to the proposed Project, since the Glenarm Building improvements would not be implemented. However, the vast majority of water consumption associated with the proposed Project is related to the operation of Unit GT-5, and water consumption by Unit GT-5 under Alternative 3 would be comparable to the proposed Project.

Since Alternative 3 would still construct and operate Unit GT-5, similar to the proposed Project, it would fully achieve the five Project Objectives. Alternative 3 would still renovate the Pump Building to serve as a mechanical shop, but it would not consolidate new administrative offices, control stations, public and shared space, and maintenance facilities within the Glenarm Building, and instead would retrofit the B-3 Control Room on the Broadway Plant to support Unit GT-5. As a result, Alternative 3 would not meet the Project Objective of rehabilitating the Glenarm Building and repurposing it into viable work space for City employees, or the Project Objective of enabling designation of the Glenarm Building as an essential facility, and would only partially achieve the Project Objective of maximizing the use and efficiency of the facility. The Alternative 3, therefore, would fully achieve five Project Objectives, partially achieve one Project Objective, and would not achieve two Project Objectives.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 3 as infeasible, which would justify rejection of Alternative 3.

#### E. ALTERNATIVE 3A – REVISED PROJECT SITE RECONFIGURATION ALTERNATIVE (“PREFERRED ALTERNATIVE”)

##### 1. Summary of Alternative

Alternative 3A (also, “Preferred Alternative) assumes that proposed Unit GT-5 would be constructed on the Glenarm Plant in the same location as under the proposed Project. However, instead of constructing centralized administrative facilities/control stations/maintenance facilities/public and shared space within the Glenarm Building that would serve existing Units GT-1 through GT-4 and proposed Unit GT-5, a modular building housing a control room would be installed near the western perimeter of the Glenarm Plant to support these units. The modular building would be located north of the PERC substation building and front Fair Oaks Avenue. The modular building would be up to 50 feet in width and 77 feet in length, or approximately 3,850 square feet, and up to 15 feet in height. The modular building would occupy a portion of the area proposed for employee parking under the original Project. The modular building would be set back approximately five-to-eight feet from Fair Oaks Avenue and separated from the PERC building on the south by a 21-foot buffer area. A new wall up to 10 feet in

height would be constructed along the Fair Oaks property line to screen the industrial appearance of the Project site. Siting of the modular building may require removal of two existing red flowering gum trees. Trees would be planted along the Arroyo Seco Parkway (SR 110) inside City property, to screen motorists' views of the existing cooling towers and other equipment.

Under Alternative 3A, the Glenarm Building would not undergo seismic rehabilitation for designation as an essential facility, nor would it be rehabilitated or reused by PWP. The existing Glenarm Building stack and duct work, and two small non-historically significant additions affixed to the south façade of the Glenarm Building would be demolished to accommodate installation of proposed Unit GT-5, but no other interior or exterior modifications would take place. Instead, a mothballing program to preserve the character-defining features of the Glenarm Building would be implemented in accordance with the National Park Technical Preservation Services publication *Brief 31 Mothballing Historic Buildings*. The State Street cul-de-sac would be closed and the existing 4,000-square-foot Pump Building on the parcel south of State Street would be remodeled and expanded to 6,000 square feet to house mechanical and maintenance shops.

Under Alternative 3A, the parking lot containing 45 employee and visitor parking spaces would be provided in the existing lot in the northwest corner of the Broadway Plant that is currently shared with Jacobs Engineering. Landscape enhancements are proposed along the eastern edge of the Broadway Plant.

All other Project components, including soil remediation, utility relocation and/or installation, and incorporation into the Glenarm Plant of the one-acre parcel south of the State Street cul-de-sac, would be implemented. Under Alternative 3A, Units B1, B2, and B3 would remain in place, and no demolition is proposed at this time. See pages 2-9 through 2-22 of the Final EIR.

As discussed in the preceding sections IX.B through IX.D, Alternatives 1 through 3 would not fully meet the Project Objectives. In contrast, Alternative 3A meets the majority of Project Objectives, avoids the Project's significant and unavoidable Land Use impact related to the placement of parking along the Power Plant's Fair Oaks Avenue frontage by providing employee and visitor parking within the lot in the northeast corner of the Broadway Plant site at the corner of Glenarm Street and Arroyo Seco Parkway, and reduces the Project's significant but mitigable impacts on historic resources by eliminating adaptive reuse of the Glenarm Building. Moreover, the Preferred Alternative does not create any new significant impacts above and beyond those identified for the proposed Project.

Two impacts were determined in the EIR to be significant and unavoidable for the proposed project: project-specific and cumulative GHG impacts related to emissions during operation, and a significant and unavoidable land use impact related to the OTSG stack height exceedance of the building height limit applicable to the Power Plant site. These impacts would remain significant and unavoidable under the Preferred Alternative. All other mitigation measures identified for the proposed Project in the EIR would be applicable to and incorporated into the Preferred Alternative and would reduce the Preferred Alternative's impacts to less than significant.

#### **X. Findings on Mitigation Measures and Alternatives Proposed in Comments**

Several comments on the Draft EIR suggest additional changes to the proposed Project. In many instances the commenters provided no evidence that the suggestions would reduce or avoid a significant impact, and the suggestions therefore do not warrant consideration or inclusion as mitigation measures or Alternatives under CEQA.

CEQA only requires a project to reduce impacts to a less than significant level. (See CEQA Guidelines Section 15041, 15126.4(a)(3), and 15126.6(b).) The City has incorporated mitigation measures into the Preferred Alternative that reduce and avoid impacts related to cultural resources and hazards and hazardous materials to less than significant levels, as discussed in Section VII, above. As described in Section VIII, significant unavoidable impacts will remain for project-specific and cumulative greenhouse gas emissions and for land use impacts associated with the OTSG stack height as outlined in the Statement of Overriding Considerations. Additional grounds for infeasibility or feasibility of the suggestions in the comment letters are provided below and in the Section 2.0, Comments and Responses on the Draft EIR, of the Final EIR. Changes to mitigation measures and additional mitigation measures based on comments received are presented in Section 3.0, Corrections and Additions to the Draft EIR, of the Final EIR.

Exhibit B of this Resolution, Mitigation Monitoring and Reporting Program for the Preferred Alternative, provides a listing of the mitigation measures which are applicable to the Preferred Alternative. Under the Preferred Alternative, there are a reduced number of impacts requiring mitigation for Cultural Resources and Hazards and Hazardous Materials, compared to the proposed Project analyzed in the Draft EIR. As such, the Mitigation Monitoring and Reporting Program for the Preferred Alternative provides a complete listing of the mitigation measures provided in the Final EIR, but mitigation measures which are not applicable to the Preferred Alternative have been stricken and the remaining mitigation measures renumbered accordingly.

The City Council adopts and incorporates by reference the responses to comments in the Final EIR and information from the City's Consultants submitted up to



the time of certification as its grounds for rejecting these suggested changes to mitigation measures and alternatives, including those changes that are outside of the scope of the Preferred Alternative, those changes addressed in other City programs, those that do not address a significant impact, and those that are otherwise infeasible for the various reasons provided in the responses. Specifically, mitigation or alternatives proposed but rejected include operating the proposed Unit GT-5 for the full number of annual permitted hours (see Responses 1-7, and 1-13), removing the 125-foot stacks associated with Units B-1 and B-2 (see Responses 1-33, 17-19, and 17-20), use of the rectangular parcel east of the Glenarm Building and currently leased to the Art Center for surface parking (see Responses 1-23, 1-34 and 1-36), use of hot and chilled water from GT-5 to heat and cool buildings (see Responses 11-10 and 11-12), feed-in-tariffs (see Response 11-13), support local clean energy projects and programs (see Responses 11-14, 11-16, and 11-19), facilitate grid interconnection (see Response 11-15), refrigerator recycling program (see Response 11-17), construction and operation of a centralized chilled water system (see Response 11-18), implement building energy standards that exceed Title 24 requirement (see Response 11-20), construction and operation of alternative fueling system infrastructure (see Response 11-21), use of a chilled water system (see Response 11-22), use of renewable energy (see Response 11-24), allowing the boilers in the Glenarm Building to remain in place until a plan for the use of the Boiler Room is finalized (see Response 12-3), various measures to reduce PM2.5 emissions (see Responses 18-30 and 18-59), various measures to reduce greenhouse gas emissions (see Responses 18-31 and 18-60), and various measures to address contaminated soils (see Responses 18-14, 18-15, 18-32, 18-33, 18-34, 18-35, 18-36, 18-42, and 18-45).

Furthermore, the City Council adopts and incorporates by reference the responses to comments in the Final EIR that resulted in the addition of new mitigation measures to address less than significant air quality impacts during construction, and the enhancement of mitigation measures already provided to address potentially significant impacts on historic resources. Specifically, comments from Pasadena Heritage (see Responses 12-4, 12-5, and 12-6) resulted in the addition of new language in existing mitigation measures CULT-1, CULT-2, and CULT-3 to further reduce impacts, and comments from the SCAQMD (see Response 5-5) resulted in additional mitigation measures AQ-1 through AQ-9 to ensure policy compliance to further reduce the Preferred Alternative's already less than significant construction air quality impacts. These changes are shown in Section 3.0, Corrections and Additions to the Draft EIR, of the Final EIR and Exhibit B, Mitigation Monitoring and Reporting Program for the Preferred Alternative of this Resolution.

## **XI. Findings on Disagreement Amongst Experts and Recirculation**

To the extent the comment letters and correspondence submitted by the public are considered expert opinion, the City Council finds that the assumptions, data, methodology, and analysis included in the Final EIR (not including the comment letters) and prepared by the City's Consultants, including information from the City's Consultants submitted up to the time of certification, is supported by substantial evidence and was the appropriate assumption, data, methodology, and analysis to use to support the impact conclusions reached in the Final EIR and the findings made herein.

The City further finds that the information submitted and incorporated into the Final EIR and submitted up to the time of certification of the Final EIR does not trigger recirculation under CEQA Guidelines §15088.5. (See, in particular, the City staff report dated April 8, 2013 and the response letters attached thereto.)

## **XII. Custodian of Records**

The documents and other materials that constitute the record of proceedings on which the Project Findings are based are located at the Pasadena City Clerk's Office, 100 North Garfield Avenue, Room S228, Pasadena, California 91109. The custodian for these documents is the City Clerk. This information is provided in compliance with Public Resources Code §21081.6(a)(2) and CEQA Guidelines §15091(e).

**EXHIBIT B**  
**Mitigation Monitoring and Reporting Program**

| Mitigation Measure   | Monitoring or Enforcement Agency                          | Timeframes for Mitigation Implementation & Enforcement |                     | Verification of Compliance |      |         |
|--|---|--|---------------------|----------------------------|------|---------|
|  |   | Applicant Implementation                               | Agency Enforcement  | Initial                    | Date | Remarks |
| <b>1. Air Quality</b>  |   |  |                     |                            |      |         |
| <b>Mitigation Measure AQ-1:</b> The Pasadena Water & Power Department and its contractors, via the City of Pasadena Public Works Department, shall require the implementation of a "Construction Staging and Traffic Management Plan" that provides for a temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.   | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |
| <b>Mitigation Measure AQ-2:</b> The Pasadena Water & Power Department and its contractors, in consultation with the City of Pasadena Department of Transportation, shall require the implementation of a "Construction Staging and Traffic Management Plan" that identifies an on-site dedicated turn lane for the movement of construction trucks and equipment. When turning off-site, trucks will be required to utilize the on-site dedicated turn lane described in the plan. | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |
| <b>Mitigation Measure AQ-3:</b> The Pasadena Water & Power Department and its contractors shall require the implementation of a "Construction Staging and Traffic Management Plan" that provides for a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.  | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |
| <b>Mitigation Measure AQ-4:</b> The Pasadena Water & Power Department and its contractors shall require that all vehicles and equipment are properly tuned and maintained according to manufacturers' specifications.  | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |

| Mitigation Measure   | Monitoring or Enforcement Agency                          | Timeframes for Mitigation Implementation & Enforcement |                     | Verification of Compliance |      |         |
|--|---|--|---------------------|----------------------------|------|---------|
|  |   | Applicant Implementation                               | Agency Enforcement  | Initial                    | Date | Remarks |
| <b>Mitigation Measure AQ-5:</b> The Pasadena Water & Power Department and its contractors shall require the use of coatings and solvents with a VOC content that exceeds the requirements of Rule 1113 if available. All coatings and solvents shall at a minimum meet the requirements of Rule 1113 unless exempted.  | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |
| <b>Mitigation Measure AQ-6:</b> The Pasadena Water & Power Department and its contractors shall use construction materials that do not require painting to the extent economically feasible and that meet the project's structural, acoustical, aesthetic, or other needs.   | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |
| <b>Mitigation Measure AQ-7:</b> The Pasadena Water & Power Department and its contractors shall use pre-painted construction materials for major equipment. Materials that require field coating are exempt from this measure.   | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |
| <b>Mitigation Measure AQ-8:</b> The Pasadena Water & Power Department and its contractors shall require contractors to use model year 2007 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) pursuant to California Code of Regulations, Title 13, §2025.   | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |
| <b>Mitigation Measure AQ-9:</b> The Pasadena Water & Power Department and its contractors shall require the use of internal combustion engines/construction equipment that operate on the project site to meet the following: <ul style="list-style-type: none"> <li>At least 50 percent of construction equipment greater than 250 hp, which are on-site for 6 or more consecutive work days, shall meet</li> </ul> | City of Pasadena Planning Division (Zoning Administrator) | During construction                                    | During construction |                            |      |         |

| Mitigation Measure   | Monitoring or Enforcement Agency  | Timeframes for Mitigation Implementation   |  | Verification of Compliance |      |         |
|--|---|--|--|----------------------------|------|---------|
|  |   | Applicant Implementation   | Agency Enforcement   | Initial                    | Date | Remarks |
| <p>Tier 3 emissions standards and be outfitted with BACT devices (e.g., Level 3 diesel emissions control devices) certified by CARB.</p> <ul style="list-style-type: none"> <li>A copy of each unit's certified tier specification and BACT documentation shall be available for inspection during construction. The contractor(s) shall monitor and record compliance for each project construction phase and document efforts undertaken to increase the use of compliant off-road vehicles, such as but not limited to bid solicitation documents, fleet registration of successful vendor(s), etc.</li> <li>Construction contractors supplying heavy duty diesel equipment, greater than 50 hp, will be encouraged to apply for AQMD SOON funds. Information including the AQMD website will be provided to each contractor which uses heavy duty diesel for on-site construction activities.</li> </ul> |   |  |  |                            |      |         |
| <b>2. CULTURAL RESOURCES</b>   |   |  |  |                            |      |         |
| <p><b>Mitigation Measure CULT-1: Recordation and Photography.</b> Prior to removal of the boilers, a Historic American Buildings Survey (HABS) level III recordation shall be prepared. The boilers, their infrastructure, and the hallway created by the boilers shall be documented in as-built drawings, large format black and white photographs, and a written narrative in accordance with HABS requirements. Completion and submittal of the HABS level III recordation of the boilers is required before City issuance of demolition and</p>   | <p>City of Pasadena Design and Historic Preservation Section to review HABS Level III documentation, verify submittal to the required repositories, and verify preparation of photographs for use in interpretive display required by mitigation measure CULT-2.</p> <p>City of Pasadena Planning Division to verify receipt of</p> | <p>Prior to any demolition within the Glenarm Building. Applicant to retain-qualified architectural historian or historic architect and photographer to complete HABS documentation.</p> <p>Prior to any demolition within the Glenarm</p> | <p>Prior to City's issuance of demolition and building permits for the Glenarm Building. Design and Historic Preservation Section to review and approve HABS documentation.</p> <p>Prior to City's issuance of demolition and building</p> |                            |      |         |

| Monitoring or Enforcement Agency   |   | Timeframes for Mitigation Implementation   |   | Implementation & Enforcement |      | Verification of Compliance |  |
|--|---|--|---|------------------------------|------|----------------------------|--|
| Mitigation Measure   | Agency  | Applicant Implementation   | Agency Enforcement  | Initial                      | Date | Remarks                    |  |
| <p>building permits for the Glenarm Building. This documentation shall be prepared by a qualified architectural historian or historic architect and a photographer experienced in Historic American Building Survey (HABS) photography. Original archival prints shall be submitted to the Library of Congress, the California Office of Historic Preservation, the City of Pasadena Planning and Development Department and the Pasadena Public Library. Furthermore, copies of the photographs shall be used in the mitigation measure CULT-2 display.</p>   | <p>completed HABS documentation from Applicant.</p>   | <p>Prior to the commencement of project operation, Applicant to ensure preparation of photographs for inclusion in interpretive exhibit as required by mitigation measure CULT-2.</p>  | <p>permits for the Glenarm Building, Design and Historic Preservation Section to verify submittal of completed HABS documentation.</p> <p>Prior to the commencement of project operation, Design and Historic Preservation Section to verify preparation of photographs for inclusion in the interpretive exhibit, as required by mitigation measure CULT-2.</p>  |                              |      |                            |  |
| <p><b>Mitigation Measure CULT-2:</b><br/> <b>Interpretive Architectural Exhibit</b>—An interpretive exhibit displaying the original layout and operation of the floor-to-ceiling hallway shall be constructed in the location of the existing character-defining hallway. This interpretive display shall be created with the assistance of a qualified historic architect who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61. Features of the hallway exhibit shall include the control panels, burner fronts, and the floating master gauge in their original location. If the metal panels supporting the burner fronts are destroyed during the demolition of the boilers, new in-kind panels shall be constructed. If the steel columns and beam supporting the floating gauge are destroyed during the demolition of the burners, new in-kind supports for the gauge shall be constructed. HABS photos taken before the demolition of the burners shall be displayed as part of the</p> | <p>City of Pasadena Design and Historic Preservation Section to review draft and final plans and specifications for interpretive architectural exhibit, ensure Applicant consultation with Pasadena Heritage during planning phase for exhibit, and verify inclusion of HABS documentation in exhibit.</p> <p>City of Pasadena Building and Safety Division to verify completed installation of the interpretive architectural exhibit prior to issuance of certificate of occupancy.</p> | <p>Prior to demolition within the Glenarm Building, Applicant to hire qualified architectural historian, historic architect, or historic preservation professional to prepare plans and specification for interpretive exhibit, including HABS documentation.</p> <p>Following demolition and prior to commencing construction within the Glenarm Building, Applicant to prepare final plans and specifications for the interpretive architectural exhibit that address construction of new, in-kind burner front panels and floating gauge supports, if needed.</p> | <p>Prior to City's issuance of demolition permits for the Glenarm Building, Design and Historic Preservation Section to review and approve draft plans and specifications for interpretive architectural exhibit, ensure Applicant consultation with Pasadena Heritage during planning phase for exhibit, and confirm the inclusion of HABS documentation.</p> <p>Prior to City's issuance of the certificate of occupancy for the Glenarm Building, Design and Historic Preservation Section to review and approve final plans and specifications for interpretive exhibit, including any new construction, and verify completed installation.</p> |                              |      |                            |  |

| Mitigation Measure  | Monitoring or Enforcement Agency   | Timeframes for Mitigation Implementation   |  | Verification of Compliance |      |
|---|--|--|--|----------------------------|------|
|   |  | Applicant Implementation   | Agency Enforcement   | Initial                    | Date |
| <p>exhibit— Issuance of the certificate of occupancy for the Glenarm Building shall be conditioned on the completed installation of the interpretive exhibit.</p> <p>During the planning phase for the interpretive exhibit, the Applicant shall ensure Pasadena Heritage is consulted and give the opportunity to provide input into the plans and specifications before they are finalized.</p>   |  |  |  |                            |      |
| <p><b>Mitigation Measure CULT-3:</b><br/> <b>Demolition Monitoring.</b>— Due to the complexity of the demolition of the burners, potential damage may occur to historic character-defining features of the Glenarm Building. The proposed project shall be designed to avoid the potential for damage to historic fabric and features. Demolition plans shall be prepared for the proposed project by a qualified historic architect. The project shall also be conditioned to require demolition and construction monitoring by a qualified historic architect, to ensure full conformance to the Standards with regard to the proposed project, and to ensure that the appropriate preservation treatment for any unanticipated preservation issues encountered during demolition/construction is properly completed.</p> | <p>City of Pasadena Design and Historic Preservation Section to verify Applicant's retention of a qualified preservation consultant to review and approve demolition plans for, and monitor demolition and construction within, the Glenarm Building; and to verify Applicant retention of a qualified historic architect and qualified historic engineer during the planning phase for seismic retrofitting of the Glenarm Building.</p> <p>City of Pasadena Planning Division (Zoning Administrator) to review demolition and construction monitoring reports.</p> | <p>Prior to commencing demolition and construction, Applicant to retain qualified preservation consultant to review demolition plans for the Glenarm Building and serve as construction monitor during Glenarm Building demolition and construction.</p> | <p>Prior to City's issuance of demolition and construction permits for the Glenarm Building Design and Historic Preservation Section to verify with Applicant that historic architect has prepared demolition plans; that historic architect has been retained for demolition and construction monitoring; and that historic architect and historic engineer have been for planning phase of seismic retrofitting of the Glenarm Building.</p> |                            |      |
| <p>In addition, a qualified historic architect and qualified historic engineer shall be retained by the Applicant to consult during the planning phase for seismic retrofitting of the Glenarm Building necessary for designation of the building</p>   | <p>City of Pasadena Planning Division (Zoning Administrator) to verify receipt of all construction monitoring reports.</p>   | <p>For the duration of Glenarm Building demolition and construction activities, Applicant is responsible for ensuring construction monitor regularly</p>   | <p>Throughout Glenarm Building demolition and construction phases, Design and Historic Preservation Section to verify construction monitoring is conducted</p>   |                            |      |



| Mitigation Measure   | Monitoring or Enforcement Agency                                 | Timeframes for Mitigation Implementation  | Agency Enforcement  | Verification of Compliance |             |
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|  |  | <b>Applicant Implementation</b>   | <b>Agency Enforcement</b>   | <b>Initial</b>             | <b>Date</b> |
| <p>as an essential facility.</p> <ul style="list-style-type: none"> <li>The demolition plan shall include a protection plan that details procedures, materials, and sequence of operations necessary to protect existing materials from damage.</li> <li>Protection shall be provided to existing historic materials wherever encountered adjacent to proposed demolition or construction work to prevent damage to or marring of materials, surfaces, and finishes. Such protection shall be of sufficient size and thickness to withstand impact from falling debris, rolling objects such as equipment, machinery and handcart; movement of materials and debris; and residue from flame cuttings such as sparks.</li> <li>The demolition plan shall be completed prior to the issuance of demolition and construction permits for the project.</li> <li>Demolition and construction monitoring by a historic architect shall occur on a weekly basis and the historic architect shall prepare and submit reports with photographs of the work at 50 percent and 100 percent completion milestones for each phase, respectively.</li> </ul> | <p>City of Pasadena Planning Division (Zoning Administrator)</p> | <p>performs monitoring and submits required monitoring reports to the City to demonstrate ongoing compliance.</p> | <p>and demolition and construction monitoring reports submitted by Applicant at the required weekly intervals and 50 percent/100 percent completion milestones.</p> |                            |             |
| <p><b>Mitigation Measure CULT-41: Archaeological Resources Treatment.</b><br/>If archaeological resources are encountered during project</p>   |  | <p>During grading and excavation, in the event that archaeological resources are encountered,</p>                 | <p>If notified by Applicant of the presence of archaeological resources during construction,</p>  |                            |             |

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| <p>implementation, an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards (the "archaeologist") shall be immediately notified and retained by the applicant and approved by the City to oversee and carry out these mitigation measures.</p> <p>The archaeologist shall coordinate with the applicant as to the immediate treatment of the find until a proper site visit and evaluation is made by the archaeologist. The archaeologist shall be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find and determine appropriate treatment. Treatment will include the goals of preservation where practicable and public interpretation of historic and archaeological resources. All cultural resources recovered shall be documented on California Department of Parks and Recreation Site Forms to be filed with the CHRIS-SCCIC. The archaeologist shall prepare a final report about the find to be filed with Project Applicant, the City, and the CHRIS-SCCIC, as required by the California Office of Historic Preservation. The report shall include documentation and interpretation of resources recovered. Interpretation will include full evaluation of the eligibility with respect to the National and California Register and CEQA. The report shall also include all specialists' reports as appendices. The Lead Agency shall designate repositories in the event that significant resources are recovered. The archaeologist shall also determine the need for archaeological and Native American monitoring for any ground-disturbing activities thereafter.</p> |                                  | <p>Applicant to notify Planning Division and retain a qualified archaeologist to implement this mitigation measure.</p> | <p>Planning Division to verify Applicant retention of qualified archaeologist for implementation of this mitigation measure.</p> <p>Following project grading and excavation and prior to project construction, Planning Division to review and approve final report submitted by Applicant or qualified archaeologist.</p> |                            |             |

| Mitigation Measure  | Monitoring or Enforcement Agency                                 | Timeframes for Mitigation Implementation & Enforcement   |   | Verification of Compliance |      |         |
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|   |  | Applicant Implementation   | Agency Enforcement  | Initial                    | Date | Remarks |
| <p>If warranted, the archaeologist will develop a monitoring program in coordination with a Native American representative (if there is potential to encounter prehistoric or Native American resources), the applicant, and the City. The monitoring program will also include a treatment plan for any additional resources encountered and a final report on findings.</p> <p><b>Mitigation Measure CULT-52:</b><br/>Paleontological Resources Treatment. A qualified paleontologist shall attend a pre-grade meeting and develop a paleontological monitoring program to cover excavations in the event they occur into the older Quaternary Alluvium. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. If excavation into Quaternary deposits occurs, monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. If it is determined that excavation will not encounter Quaternary deposits, no further measures need be taken. The frequency of monitoring inspections shall be based on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered.</p> <p>If a fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the paleontologist's discretion and to reduce any</p> | <p>City of Pasadena Planning Division (Zoning Administrator)</p> | <p>During grading and excavation, in the event that paleontological resources are encountered, Applicant to notify Planning Division and retain a qualified paleontologist to implement this mitigation measure.</p> | <p>If notified by Applicant of the presence of paleontological resources during grading and excavation, Planning Division to confirm Applicant retention of qualified paleontologist for implementation of this mitigation measure.</p> <p>Following project grading and excavation and prior to project construction, Planning Division to confirm receipt of final report from Applicant or qualified paleontologist.</p> |                            |      |         |

| Mitigation Measure  | Monitoring or Enforcement Agency                          | Timeframes for Mitigation Implementation & Enforcement  |  | Verification of Compliance |      |         |
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|   |   | Applicant Implementation  | Agency Enforcement   | Initial                    | Date | Remarks |
| <p>construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.</p> <p>If fossils are found following completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.</p> |   |   |  |                            |      |         |
| <p><b>Mitigation Measure CULT-63: Human Remains Treatment.</b></p> <p>If human remains are encountered unexpectedly during construction excavations and grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native</p>   | City of Pasadena Planning Division (Zoning Administrator) | During grading and excavation, in the event that human remains are encountered, Applicant to notify Planning Division and initiate consultation with the NAHC and follow that agency's recommended course of action to implement this mitigation measure. | If notified by Applicant of the presence of human remains during grading and excavation, Planning Division to confirm Applicant consultation with the NAHC for implementation of this mitigation measure. Following project grading and excavation and prior to project construction, Planning Division to |                            |      |         |

| Mitigation Measure  | Monitoring or Enforcement Agency | Timeframes for Mitigation Implementation & Enforcement  |   | Verification of Compliance |      |         |
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|   |                                  | Applicant Implementation  | Agency Enforcement  | Initial                    | Date | Remarks |
| <p><b>Mitigation Measure</b></p> <p>American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent of the deceased Native American, who shall then help determine what course of action shall be taken in dealing with the remains. The applicant shall then under take additional steps as necessary in accordance with <i>CEQA Guidelines</i> Section 15064.5(e). Preservation of the remains in place or project design alternatives shall be considered as possible courses of action by the applicant, the City, and the Most Likely Descendent.</p> |                                  |   | confirm Applicant has completed the NAHC's recommended course of action.  |                            |      |         |
| <p><b>3. HAZARDS AND HAZARDOUS MATERIALS</b></p>  |                                  |   |   |                            |      |         |
| <p><b>Mitigation Measure HAZ-1:</b> Prior to the issuance of demolition permits, PWP shall submit to the City of Pasadena City of Pasadena Fire Department a comprehensive pre-demolition asbestos survey in accordance with SCAQMD Rule 1403. All identified asbestos-containing materials shall be removed and disposed of by a registered Cal-OSHA certified asbestos abatement contractor prior to any disturbance of the material, and the Applicant shall submit documentary proof of such handling to the City.</p>  | City of Pasadena Fire Department | <p>Prior to demolition, Applicant to submit comprehensive pre-demolition survey.</p> <p>Following demolition, Applicant to submit proof of asbestos abatement and disposal to Building and Safety Division.</p> | <p>Prior to issuance of demolition permits, Building and Safety Division to verify receipt of pre-demolition asbestos survey from Applicant.</p> <p>Prior to construction, Building and Safety Division to verify receipt of proof of asbestos abatement and disposal from Applicant.</p> |                            |      |         |
| <p><b>Mitigation Measure HAZ-2:</b> Prior to issuance of demolition permits, PWP shall submit to the City of Pasadena Fire Department a lead-based paint survey for all existing buildings located on the project site. All identified lead-based paint shall be handled and disposed of pursuant to OSHA regulations, and the Applicant shall submit documentary</p>   | City of Pasadena Fire Department | <p>Prior to demolition, Applicant to submit comprehensive pre-demolition survey.</p> <p>Following demolition, Applicant to submit proof of lead-based paint</p>   | <p>Prior to demolition, Building and Safety Division to verify receipt of pre-demolition lead-based paint survey from Applicant.</p> <p>Prior to issuance of building permit(s), Building and Safety</p>  |                            |      |         |

| Mitigation Measure   | Monitoring or Enforcement Agency        | Timeframes for Mitigation Implementation & Enforcement   |   | Verification of Compliance |      |
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| <p>proof of such handling to the City.</p>   |   | <p>Building and Safety Division</p>  | <p>Division to verify receipt of proof of lead-based paint abatement and disposal from Applicant.</p>                                       |                            |      |
| <p><b>Mitigation Measure HAZ-31:</b><br/>Shallow soil contamination at the proximity of GP32 (total lead concentration of 1,400 ppm at 1.5 feet bgs), as indicated in the Phase II Environmental Site Assessment, shall be excavated and disposed of off-site. The lateral extent of the remedial excavation may extend to GP-31, GP-33, and BH-7. The vertical extent of remedial excavation is anticipated to be less than 5 feet. In addition, if the soil at the vicinity of the above-mentioned locations is planned for off-site disposal, then the excavated soil shall be stockpiled and a WET test shall be made on stockpile soil samples to determine the soluble lead concentration of the stockpiled soil for soil disposal purposes.</p> | <p>City of Pasadena Fire Department</p> | <p>During grading and excavation, Applicant to implement this mitigation measure.</p>  | <p>Prior to the commencement of construction, Building and Safety Division to verify Applicant compliance with this mitigation measure.</p> |                            |      |
| <p><b>Mitigation Measure HAZ-42:</b> If the soil at the vicinity of the locations (as identified in the Phase II Environmental Site Assessment) where TRPH concentrations exceed 1,000 ppm is planned for off-site disposal, then the excavated soil shall be stockpiled and analytically tested for TPH and VOCs using EPA Method 8015 M and 8260B or per soil disposal facility requirements.</p>  | <p>City of Pasadena Fire Department</p> | <p>During grading and excavation, Applicant to implement this mitigation measure.</p>  | <p>Prior to the commencement of construction, Building and Safety Division to verify Applicant compliance with this mitigation measure.</p> |                            |      |
| <p><b>Mitigation Measure HAZ-53:</b> During project design development and prior to initiation of excavation and grading activities, PWP shall retain a qualified environmental consultant to prepare a soils management plan that shall be submitted to the City of Pasadena Fire Department for review and approval.</p>   | <p>City of Pasadena Fire Department</p> | <p>During project design development and prior to excavation and grading, Applicant to retain qualified consultant to prepare soils management plan and submit plan to Building and Safety</p> | <p>Prior to the commencement of grading and excavation, Building and Safety Division to review and approve soils</p>                        |                            |      |

| Mitigation Measure   | Monitoring or Enforcement Agency | Timeframes for Mitigation Implementation   |  | Verification of Compliance |      |
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|  |                                  | Applicant Implementation   | Agency Enforcement   | Initial                    | Date |
| <p>The soils management plan shall be implemented during excavation and grading activities on the project site to ensure that any contaminated soils are properly disposed of offsite. The plan shall include, but not necessarily be limited to the following:</p> <ul style="list-style-type: none"> <li>• A qualified environmental consultant shall be present as necessary during excavation or grading activities to monitor compliance with the soils management plan and to actively monitor the soils and excavations for evidence of contamination.</li> <li>• Any soil encountered during excavation or grading activities that appears to have been affected by hydrocarbons or any other contamination shall be evaluated, based upon appropriate laboratory analysis, by a qualified environmental consultant prior to offsite disposal at a licensed facility.</li> <li>• Soils in the southwestern corner of the site near Boring Location GP32 and where TRPH concentrations exceed 1,000 ppm, as identified in the Limited Phase II ESA, shall be segregated and analyzed prior to offsite disposal. This may require over-excavation in these area and further analysis of this soil to determine the extent of soil contamination.</li> <li>• All identified contaminated soils shall be properly handled and transported to an appropriately licensed disposal facility.</li> </ul> |                                  | <p>Division for approval.</p> <p>During grading and excavation, Applicant to implement approved soils management plan. Upon completion of grading and excavation, Applicant to notify Building and Safety Division of completion of soils management plan.</p> | <p>management plan.</p> <p>Following grading and excavation and prior to construction, Building and Safety Division to verify completion of implementation of soils management plan.</p> |                            |      |