

segments of Holly Street and Leonard Pieroni Street are under construction. This portion of the Project's construction management plan shall be subject to the review and approval of the PPD. The construction management plan may include the following measures:

- Dedicated compliance from the construction company with the project's construction hours with 24-hour contact phone numbers for PPD and other city departments;
- Development of an incident management program so that the construction company can keep the city aware of issues;
- Develop investigative process for all theft losses which includes police reporting procedures and steps taken prior to reporting;
- Ensure a security walk-thru with the city prior to the start of Project construction;
- An agreement between the city and the construction company regarding agreed upon security measures;
- Monitoring compliance through regular meetings with the construction company and the City;
- Commitment to establish a traffic mitigation plan with the City to include street closures, acceptable levels of traffic flow through the construction area, & minimize traffic delays;
- Use of the appropriate number of construction employees for road closures and temporary traffic stops;
- Development of alternate traffic routes; and
- A commitment to install temporary or portable lighting in specific areas to reduce break-in, thefts, and other criminal activity.

Mitigation Measure K.1-2: The Applicant shall consult with the PPD prior to and during Project construction and operation to ensure that adequate security measures are incorporated into Phase 1 and Phase 2 of the Project. During this consultation, the Applicant will be required to submit site circulation plans for

PPD review. Security measures incorporated into the Project may include the following:

- On-site uniformed security that is visible during critical times such as during the night hours;
- The posting and use of surveillance cameras at strategic points and in areas with higher risk of break-ins;
- Use of lighting for darkened areas and other sections storing inventory;
- Use of local security companies familiar with Pasadena;
- Trespass letters on file with the PPD to help expedite trespass arrests when needed;
- Limiting the number of hardwired appliances to reduce theft;
- Signage posting of warnings, hazards, and trespassing;
- Identifiable and easily seen markings on equipment (reduce thefts);
- Reduce access to equipment storage areas to designated workers; and
- Tools and store depots should be permanently staffed during the day to reduce opportunity for thefts.

Mitigation Measure K.2-1: Upon the issuance of the first building permit for Phase 1 and Phase 2 development, respectively, the Applicant shall enter into an agreement with the City to reimburse the City for all of the costs of a City Fire Department Inspector (e.g., include travel time, inspection, research time, vehicle and/or mileage, materials, and supplies) who shall be assigned to the Project during Phase 1 and Phase 2 construction.

Mitigation Measure K.2-2: The reconstruction of Holly and Leonard J. Pieroni Streets shall occur in the following sequence prior to the commencement of any construction within the North Development Area. First, the new section of Holly Street, between Leonard J. Pieroni Street and Pasadena Avenue, shall be constructed with an all weather surface to the satisfaction of the PFD. Once this portion of the overall Holly Street improvement is completed, construction may commence on either the eastern portion of Holly Street (between Leonard J. Pieroni Street and Fair Oaks Avenue) or Leonard J. Pieroni Street (between

Holly Street and Union Street). At all times, at least two out of the three street segments that comprise the on-site segment of Holly Street and Leonard J. Pieroni Street shall be available for PFD access.

Mitigation Measure K.2-4: The Project's Construction Traffic Management Plan shall include provisions to ensure PFD access along Fair Oaks Avenue between Union Street and Walnut Street throughout the Project's construction period, particularly during those periods of time when Project construction requires the closure of a travel lane along Fair Oaks Avenue. To achieve this, an assessment of roadway volumes prior to the initiation of a lane closure along Fair Oaks Avenue shall be undertaken. If it is determined by DOT and PFD that traffic volumes with the lane closure would preclude emergency vehicle access along Fair Oaks Avenue, one or more of the following options would be implemented: (1) lane closures would be prohibited during the period(s) of the day during which those impacts would occur, (2) removal of the Fair Oaks Avenue center median adjacent to the Project Site, or (3) additional measures as determined by DOT and PFD.

Mitigation Measure K.2-5: Traffic signals in the Project area shall be equipped with emergency vehicle traffic signal preemption systems. The specific traffic signals requiring this system shall be determined by both the PFD and DOT in conjunction with both Phase 1 and Phase 2 development.

b. Facts in Support of Findings

The Project has the potential to result in a temporary increase in criminal activities and increased traffic congestion and possible lane closures during construction which could increase the demand for Pasadena Police Department services and affect response times. There is the potential for increased criminal activity which could result in an increase in demand for police protection services during operation of the Project. The Project would not exceed the staff and equipment capabilities of the Pasadena Fire Department stations serving the Project Site or other performance objectives for fire protection services.

Based on the analysis in the Final EIR, with the implementation of the identified project design features and mitigation measures, Project-level and cumulative impacts to PPD services, during construction and operations of Phase 1, Phase 2 and Project Buildout would be less than significant.

Based on the analysis in the Final EIR, with compliance with the identified regulatory compliance measure and implementation of the identified mitigation

measures, Project-level and cumulative impacts to PFD services during construction and operations of both Phase 1 and Phase 2 development, as well as at Project buildout, would be less than significant.

I. ENERGY

a. Findings

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen any potential impact to energy. Specifically, the following measures are imposed upon the Project to ensure a less than significant impact:

Mitigation Measure F-1: All off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of Phase 1 or Phase 2 construction activities for the proposed Project shall meet Tier 3 standards where commercially available per SCAQMD. In addition, after January 1, 2015, all construction equipment subject to this mitigation measure shall meet Tier 4 standards, where available, and be outfitted with CARB- certified BACT devices, to the extent feasible and commercially available (e.g., void the manufacturer's engine warranty or create workplace conditions that are not consistent with OSHA requirements).

The Project Applicant shall make available to the lead agency and the South Coast Air Quality Management District a comprehensive inventory of equipment subject to this mitigation measure. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment.

The Project shall use as many haul trucks for soil export/import that meet 2010 NOx emission levels as are commercially available. In the event that a sufficient number of haul trucks that meet 2010 NOx emission levels are not commercially available to meet the Project's requirements, then the Project shall use as many haul trucks for soil export/import that meet 2007 NOx emission levels as are commercially available. The Project Applicant shall make available to the City of Pasadena a comprehensive inventory of the haul trucks subject to this mitigation measure.

Mitigation Measure F-2: All construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.

Mitigation Measure F-3: Petroleum powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators unless use of electricity from power poles would present a safety concern to the general public or construction personnel.

b. Facts in Support of Findings

The Project would avoid and reduce inefficient, wasteful, and unnecessary consumption of energy. The Project includes a comprehensive set of project design features and mitigation measures that address energy consumption. In addition to the above listed mitigation measures, the regulatory compliance measures and project design features identified in the EIR would apply:

Implementation of the regulatory compliance measures, project design features, and mitigation measures described above would reduce any energy resources impacts during construction and operations of Phase 1 and Phase 2 development, as well as Project buildout to a less than significant level. In addition, the Project's contribution to cumulative impacts related to energy resources would not be considerable and, thus, would also be less than significant.

VIII. Significant and Unavoidable Impacts

In the areas of transportation and air quality and noise, there are instances where environmental impacts would remain significant and unavoidable even after mitigation. These areas are described below.

A. TRANSPORTATION

1. Significant Impacts at the Intersection of Fair Oaks Avenue and Walnut Street during weekdays.

a. Findings

Changes or alterations have been required in, or incorporated into the Project to reduce impacts to the various intersections affected by the proposed Project. With mitigation measures incorporated almost all impacts are reduced to less than significant levels, however, impacts at Fair Oaks and Walnut Street during weekdays will remain significant and unavoidable.

There are no feasible mitigation measures that would reduce potentially significant impacts to the intersection of Fair Oaks and Walnut to a less than significant level during weekdays, and no feasible measures, other than those listed below, that would reduce this impact to any material extent.

Mitigation Measure B.1-1: Transportation Demand Management Program. The Project Applicant, or successor in interest, shall develop a TDM Program that includes a combination of the following strategies, or equivalent measures, as approved by the City's Department of Transportation:

- Flexible work schedules, telecommuting programs and alternative work schedules;
- Participation in an existing or formation of a new Transportation Management Association (TMA);
- Pedestrian/bicycle-friendly environment;
- Pedestrian Improvements;
- Bike Share Program including public bike share kiosk;
- Bicycle amenities (bicycle racks, etc.);
- Rideshare/carpool/vanpool promotion and support;
- Transportation Information Center (TIC) including education and information on alternative transportation modes and on-site transit kiosk;
- Guaranteed Ride Home (GRH) program;
- On-site flex cars; and
- Transit passes (i.e. Bus Passes, EZ Pass, TAP cards) for residents and employees.

Mitigation Measure B.1-2: Transportation Management Association. The Project Applicant, or successor in interest, shall facilitate the formation of a new on-site TMA or become part of an existing TMA in the Study Area. The TMA's objective shall be to create Transportation Management Plans (TMPs) and promote awareness of the available TDM strategies among employees,

residents and patrons and potentially the broader public in the Study Area. The TMA initiatives shall include the following:

- Online Rideshare matching and Carpool/Vanpool Program;
- Bike and walk to work promotions; On-site Flex Car;
- Guaranteed ride home;
- Preferential load/unload or parking location for high occupancy vehicles (HOV); and
- Transportation Information Center.

Mitigation Measure B.1-6: The Project Applicant, or successor in interest, shall provide pedestrian lighting on both sides of the street along Holly Street from the Project Site to the Memorial Park Metro Gold Line Station (Arroyo Parkway) to the extent such lighting complies with the provisions of the provisions of the Old Pasadena Streetscapes and Alley Walkways Plan and Elements.

Mitigation Measure B.1-7: The Project Applicant, or successor in interest, shall provide sidewalk improvements, such as repairing cracks and uneven sections adjacent to the Project Site. The location of the area subject to this mitigation measure is shown in Figure IV.B.1-20 on page IV.B.1-82 (Reprinted and included in Appendix A of this MMRP).

Mitigation Measure B.1-8: The Project Applicant, or successor in interest, shall provide audio tactile pedestrian heads for vision-impaired pedestrians and provide pavement treatments (i.e., special pavement textures, paint designs) at crosswalks at the intersections of Corson Street/Walnut Street, Pasadena Avenue/Union Street, De Lacey Avenue/Union Street, Fair Oaks Avenue/Walnut Street, Fair Oaks Avenue/Holly Street, and Fair Oaks Avenue/Union Street. The location of these improvements is shown in Figure IV.B.1-20 on page IV.B.1-82 (Reprinted and included in Appendix A of this MMRP).

Mitigation Measure B.1-9: The Project Applicant, or successor in interest, shall improve the north leg of the intersection of Fair Oaks Avenue and Union Street to shorten the pedestrian crossing distance.

Mitigation Measure B.1-10: The Project Applicant, or successor in interest, shall provide a crosswalk on the north leg of the intersection at Fair Oaks Avenue and Holly Street to improve pedestrian connections in the vicinity of the Project Site. This proposed improvement is shown in Figure IV.B.1-20 on page IV.B.1-82 (Reprinted and included in Appendix A of this MMRP).

Mitigation Measure B.1-11: The Project Applicant, or successor in interest, shall provide an on-site pedestrian way-finding program to enhance pedestrian movement between the Project Site and its surroundings. This system could include real-time transit information as well as pedestrian way-finding information. The system could have digital media display as well as projected images on to the improved sidewalks within the Project Site. An example of such a system could be the TransitScreen's SmartWalk system. The SmartWalk system involves projecting the real-time dashboard of information to the sidewalks, plazas or other public spaces embedding not only transit information but also way-finding options with think arrows pointing the public in the direction of buses, train station, bike share stations and other relevant places of interest. This improvement is shown in Figure IV.B.1-20 on page IV.B.1-82 (Reprinted and included in Appendix A of this MMRP).

Mitigation Measure B.1-12: The Project proposes to provide a bicycle lane along Holly Street between Fair Oaks Avenue and Pasadena Avenue connecting the Project component uses and other bicycle infrastructure on-site to the existing bicycle lane along Pasadena Avenue. The Project Applicant, or successor in interest, shall implement a Bike Share Program with two on-site kiosks containing 10 bikes at each location to encourage more employees, residents and visitors to ride bicycles. Bike sharing programs loan or rent bicycles for short trips, providing a convenient, affordable way to get around without a car.

Mitigation Measure B.1-13: The Project Applicant, or successor in interest, shall provide bike racks at convenient locations throughout the Project Site, where feasible to facilitate the safe storage of bicycles and provide convenient bicycle access to all facilities on the Project Site.

Mitigation Measure B.1-14: The Project shall implement a system-wide signal system upgrade within the Study Area by upgrading the signal controller systems and installing CCTV cameras along key travel corridors at the following 33 locations:

- Intersection #9—Orange Grove Boulevard/SR-134 Freeway Eastbound Off-Ramp;
- Intersection #13-1-210 Freeway Eastbound Off-Ramp/Maple Street;
- Intersection #14—St. John Avenue/Walnut Street; Intersection #15—St. John Avenue/Union Street;
- Intersection #16—St. John Avenue/Colorado Boulevard;
- Intersection #17—St. John Avenue/Green Street;
- Intersection #18—St. John Avenue/Del Mar Boulevard;
- Intersection #19—Pasadena Avenue/Walnut Street;
- Intersection #20—Corson Street/Walnut Street;
- Intersection #21—Pasadena Avenue/Union Street;
- Intersection #22—Pasadena Avenue/Colorado Boulevard;
- Intersection #23—Pasadena Avenue/Green Street;
- Intersection #24—Pasadena Avenue/Del Mar Boulevard;
- Intersection #30—Fair Oaks Avenue/Orange Grove Boulevard;
- Intersection #31—Fair Oaks Avenue/Villa Street;
- Intersection #32—Fair Oaks Avenue/Maple Street;
- Intersection #33—Fair Oaks Avenue/Corson Street;
- Intersection #34—Fair Oaks Avenue/Walnut Street;
- Intersection #35—Fair Oaks Avenue/Holly Street;
- Intersection #36—Fair Oaks Avenue/Union Street;
- Intersection #37—Fair Oaks Avenue/Colorado Boulevard;

- Intersection #38—Fair Oaks Avenue/Green Street;
- Intersection #39—Fair Oaks Avenue/Valley Street;
- Intersection #40—Fair Oaks Avenue/Del Mar Boulevard;
- Intersection #41—Fair Oaks Avenue/California Boulevard;
- Intersection #43—Raymond Avenue/Walnut Street;
- Intersection #46—Raymond Avenue/Colorado Boulevard;
- Intersection #47—Raymond Avenue/Green Street;
- Intersection #53—Arroyo Parkway/Colorado Boulevard;
- Intersection #61—Marengo Avenue/Maple Street;
- Intersection #62—Marengo Avenue/Corson Street;
- Intersection #63—Marengo Avenue/Walnut Street; and
- Intersection #66—Marengo Avenue/Colorado Boulevard.

The intersections in the Study Area where signal controller and other equipment upgrades are proposed are shown in Figure IV.B.1-20 on page IV.B.1-80 (Reprinted and included in Appendix A of this MMRP).

Mitigation Measure B.1-15: Intersection #13-1-210 Freeway Eastbound Off-Ramp/Maple Street. The following improvement shall be implemented at this intersection: (1) install a traffic signal at this location subject to the review and approval of the City of Pasadena and Caltrans.

b. Facts in Support of Findings

The Project would result in a significant impact at the intersection of Fair Oaks Avenue and Walnut Street on weekdays with Phase 1 and Phase 2 development. All other intersection impacts on weekdays and all intersection impacts on Saturdays with Phase 1 and Phase 2 development would be less than significant with mitigation.

Intersection improvements designed to alleviate significant impacts of the Project consist of a combination of signal system and phasing enhancements. Widening and/or

other physical improvements to the intersections were considered but are deemed infeasible because these types of improvements would be in direct conflict with the City of Pasadena's policies relative to the multi-modal, community-oriented, non-auto transportation system enhancements that are sustainable and enhance livability within the City. Further, with implementation of the proposed mitigation measures, all intersection impacts, except one intersection on weekdays, under the Future (2020) With Phase 2 traffic scenario would be less than significant. The one exception is the intersection at Fair Oaks Avenue and Walnut Street (#34) that is forecasted to have a significant impact on weekdays during the P.M. peak hour for the Future (2020) With Phase 2 conditions even with implementation of the Project's mitigation program. Therefore, Phase 2 development under Future (2020) With Phase 2 conditions would result in a significant unavoidable impact that cannot be mitigated at the intersection of Fair Oaks Avenue and Walnut Street during the P.M. peak hour on weekdays.

2. Significant Impacts to Street Segments on Weekdays and Saturdays

Implementation of the proposed Project would result in significant impacts to street segments on weekdays and Saturdays.

a. Findings

Changes or alterations have been required in, or incorporated into the Project to reduce impacts to various street segments affected by the proposed Project, however, impacts on weekdays and Saturdays will remain significant and unavoidable.

There are no feasible mitigation measures that would reduce potentially significant street segment impacts to a less than significant level during weekdays, and no feasible measures, other than those listed below, that would reduce these impacts to any material extent.

Mitigation Measure B.1-16: The Project Applicant, or its successor in interest, shall contribute funds to the City's Neighborhood Traffic Management Capital Improvement Program Fund. The funds would be used to implement traffic management measures to protect neighborhoods potentially influenced by the Project's traffic.

b. Facts in Support of Findings

Some of the analyzed roadway segments require soft measures, whereas others may require physical improvements and consideration of project alternatives or a

combination of these improvements. The mitigation measures identified above require that the Project contribute funds to the Neighborhood Traffic Management Capital Improvement Program Fund. The funds would be used to implement traffic management measures to protect neighborhoods potentially influenced by the Project's traffic. However, there are no feasible mitigation measures available to reduce street segment impacts to below levels of significance. Thus, significant and unavoidable street segment impacts would remain.

B. AIR QUALITY

1. Significant Impact – Regional Construction Impacts.

The Project would result in regional construction emissions that exceed SCAQMD prescribed threshold levels of nitrogen oxides (NO_x) during Phase 1 construction.

a. Findings

Changes or alterations have been required in, or incorporated into, the Project to lessen air quality impacts. Nonetheless, the proposed Project is anticipated to have a significant impact because the construction emissions of NO_x during Phase 1 Construction, exceed SCAQMD threshold levels even with mitigation measures incorporated.

There are no feasible mitigation measures that would reduce potentially significant air quality impacts to a less than significant level and no feasible measures, other than those listed below, which would reduce this impact to any material extent:

Mitigation Measure F-1: All off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of Phase 1 or Phase 2 construction activities for the proposed Project shall meet Tier 3 standards where commercially available per SCAQMD. In addition, after January 1, 2015, all construction equipment subject to this mitigation measure shall meet Tier 4 standards, where available, and be outfitted with CARB-certified BACT devices, to the extent feasible and commercially available (e.g., void the manufacturer's engine warranty or create workplace conditions that are not consistent with OSHA requirements).

The Project Applicant shall make available to the lead agency and the South Coast Air Quality Management District a comprehensive inventory of equipment subject to this mitigation measure. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier

standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment.

The Project shall use as many haul trucks for soil export/import that meet 2010 NOx emission levels as are commercially available. In the event that a sufficient number of haul trucks that meet 2010 NOx emission levels are not commercially available to meet the Project's requirements, then the Project shall use as many haul trucks for soil export/import that meet 2007 NOx emission levels as are commercially available. The Project Applicant shall make available to the City of Pasadena a comprehensive inventory of the haul trucks subject to this mitigation measure.

Mitigation Measure F-2: All construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.

Mitigation Measure F-3: Petroleum powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators unless use of electricity from power poles would present a safety concern to the general public or construction personnel.

Mitigation Measure F-4: Architectural coatings for interiors shall meet super-compliant architectural coating requirements as identified by the SCAQMD (www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf), and where practical, the use of materials that do not require painting or the use of pre-painted construction materials shall be encouraged.

Mitigation Measure F-5: Maximum daily soil disturbance during Phase 1 shall not exceed 6.66 acres of active grading area and 3,400 cubic yards of export of earth materials per day. Maximum daily soil disturbance during Phase 2 shall not exceed 5.6 acres of active grading area and 3,400 cubic yards of export of earth materials per day.

b. Facts in Support of Findings

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. However, even with the incorporation of the mitigation measures, as shown in Table IV.F-11 on page IV.F-60, the proposed Project would exceed the SCAQMD regional significance threshold for NOX during Phase 1 construction. Phase 2 regional construction VOC and NOX impacts would be reduced to

less than significant with the incorporation of the proposed mitigation measures. With respect to localized emissions from construction activities, localized impacts attributable to Phase 1 and Phase 2 construction would be less than significant on a Project level and cumulative basis. Furthermore, actual construction activities would on average occur at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions. Therefore, the modeled set of conservative assumptions overstates the potential regional and localized impacts. No other feasible mitigation measures have been identified that would further reduce or otherwise mitigate the residual significant construction impact related to Phase 1 NOX emissions.

2. Significant Impact – Regional Operational Impacts.

a. Findings

Changes or alterations have been required in, or incorporated into, the Project to lessen air quality impacts. Nonetheless, the proposed Project is anticipated to have a significant impact because operation of the proposed Project would have a significant and unavoidable effect with respect to regional air quality.

The proposed Project would incorporate project design features to support and promote environmental sustainability as discussed under Section IV.G, Greenhouse Gas Emissions, of the EIR. While these features are designed primarily to reduce greenhouse gas emissions, they would also serve to reduce criteria air pollutants.

Mitigation measures provided in Section IV.B, Traffic, Access, and Parking, of the EIR would also serve to reduce air pollutant emissions. Provided below is a summary of key provisions of the Transportation Demand Management Program (TDM) that could potentially reduce mobile source air pollutant emissions. The TDM plan is a set of strategies proposed for the Project that would encourage employees, residents and patrons of the Project to reduce vehicular traffic on the street and freeway system by promoting non-auto travel through pedestrian/bicycle-friendly design and orientation that facilitates transit use. The Project would develop and implement a TDM Program that would include the following strategies:

- Transportation Management Association (TMA): Join an existing or form a new TMA to promote awareness of the available TDM strategies and create Transportation Management Plans (TMPs) for the employees, residents, and patrons of the Project.

- Rideshare/Carpool/Vanpool Promotion and Support: The TMA will start an online daily commute ride-matching service to match interested patrons with carpools and vanpools.
- On-Site Flex Car: Flex car is a car-sharing service that combines the benefits of using member's own cars and riding public transportation. Members could rent the cars for personal and business errands and still use alternate modes of travel for their home to work commute trips. The effectiveness of the rideshare program is increased with the addition of a flex car service and other strategies due to the unpredictability of individual schedules.
- Preferential Load/Unload or Parking Location for High Occupancy Vehicles (HOV): Preferential load/unload or parking location involves designation of the most convenient locations in employment areas for HOV such as carpools and vanpools. Having preferential facilities can encourage employees to use higher occupancy modes of travel, such as transit, carpools, and vanpools.
- Transportation Information Center (TIC): A TIC is a centrally-located commuter information center where the Project employees, residents, and patrons can obtain information regarding commute programs, and individuals can obtain realtime information for planning travel without using an automobile. The TIC will provide orientations for new employees and residents as well as providing information about transit schedules, commute planning, rideshare, telecommuting, bicycle and pedestrian plans, and the flex car program.
- Guaranteed Ride Home (GRH): GRH is a commute trip reduction service managed by the TMA which would cover employees participating in the carpool/vanpool program or using transit to/from the Project.
- Transit Passes—The Proposed Project would provide all eligible employees and residents monthly transit passes (EZ Transit TAP card or modified version) giving them access to all transit lines including Pasadena ARTS.

In addition to these strategies, the Pasadena ARTS Line 40 would be re-routed to provide service to the Project site via Holly Street. The Project would also include substantial pedestrian and bicycle improvements. The Project would promote a pedestrian and bicycle friendly environment consistent with goals of the City of

Pasadena by providing pedestrian lighting on both sides of the street along Holly Street from the Project Site to the Memorial Park Metro Gold Line Station (Arroyo Parkway). The Project would also include a Bike Share Program with two on-site kiosks containing 10 bikes at each location and bike racks, where feasible, throughout the Project site.

b. Facts in Support of Findings

Regional emissions resulting from Phase 1 (2016) operation of the proposed Project would exceed the SCAQMD daily threshold for NOX. Phase 2 (2020) operation of the proposed Project would not exceed any of the SCAQMD daily significance thresholds as the emissions inventory only includes incremental emissions associated with Phase 2 and pollutant emission factors decrease from 2016 to 2020. Buildout of the proposed Project (combined Phase 1 and Phase 2 in 2020) would exceed the SCAQMD daily thresholds for NOX and VOC. Therefore, proposed Project operational emissions would result in a significant impact. It is important to note that the emissions inventories presented in Table IV.F-5 conservatively do not include mobile source emission reductions related to the Project's traffic mitigation measures (e.g., transportation demand management program) included in Section IV.B, Traffic, Access, and Parking, of this Draft EIR.

As with the Project buildout (2020) analysis year, the Project (2013) regional emissions resulting from operation of the Project would exceed the SCAQMD regional significance thresholds for VOC and NOX. Therefore, proposed Project operational emissions would result in a significant impact. While the analysis using 2103 emission factors is included, there is a low likelihood that the conditions forecasted under this scenario would ever occur as it would require a delay in the implementation of the future provisions presently set forth in the California Clean Air Act.

The proposed Project would include project design features and mitigation measures provided in Section IV.B, Traffic, Access, and Parking, of the Draft EIR that would also serve to reduce air pollutant emissions.

Therefore, operation of the proposed Project would have a significant and unavoidable Project-level impact on regional air quality.

C. NOISE

a. Findings

Changes or alterations have been required in, or incorporated into, the Project that lessen potential construction noise from the Project itself. Nonetheless, the proposed Project is anticipated to have a significant cumulative impact, but only in the

event that other nearby projects are under concurrent construction. Even with mitigation measures incorporated, the impacts related to cumulative construction noise will remain significant and unavoidable.

There are no feasible mitigation measures that would reduce potentially significant cumulative construction noise to a less than significant level and no feasible measures, other than those listed below, which would reduce this impact to any material extent:

Mitigation Measure H-1: No person shall operate any pile driver, power shovel, pneumatic hammer, derrick power hoist, forklift, cement mixer or any other similar construction equipment at any time other than as listed below:

1. From 7:00 A.M. to 7:00 P.M. Monday through Friday;
2. From 8:00 A.M. to 5:00 P.M. on Saturday;
3. Operation of any of the listed construction equipment is prohibited on Sundays and holidays.

The prohibitions set forth above shall not apply to the performance of emergency work as defined in Section 9.36.030 of the Pasadena Municipal Code. For purposes of this section, holidays are New Year's Day, Martin Luther King Jr. Day, Lincoln's Birthday, Washington's Birthday, Memorial Day, Independence Day, Labor Day, Veteran's Day, Thanksgiving Day, Day after Thanksgiving, and Christmas.

c. Facts in Support of Findings

Project construction within the boundaries of the Project Site would not generate noise levels that exceed 85 dBA at 100 feet from the source. Off-site construction truck travel attributable to the Project would generate less than significant noise levels, although cumulative off-site construction truck travel may result in significant impacts for the noise sensitive receptors located on and near Corson Street leading to Marengo Avenue on-ramp to the I-210 freeway.

Compliance with the regulatory compliance measures, project design features, and required mitigation measures would reduce Project construction noise levels to the extent feasible. Implementation of Mitigation Measure H-1 would limit the construction hours to daytime hours during weekday and Saturday, which would reduce the duration of the Project's less than significant construction noise impacts. The Project could combine with Related Project No. 19 and Related Project No. 48 to result in cumulative construction noise impacts at the sensitive uses (residential, school and hotel) located

between the Project and the two Related Project sites. Since the timing of construction activities for these related projects cannot be defined, the potential for concurrent construction projects is uncertain. However, to the extent that concurrent construction does occur, cumulative construction noise could exceed ambient noise levels at the nearest noise-sensitive uses. Therefore, if construction of Related Project No. 19 and Related Project No. 48 were to occur concurrently with the Project, cumulative noise impacts at the Marriott Courtyard Hotel (receptor R1), the St. Andrew school (receptor R5), and the residential apartment building at the southwest corner of Walnut Street and Raymond Avenue could be significant. While a significant cumulative impact could occur, construction-related noise levels from the related projects would be intermittent and temporary, and it is anticipated that each project's construction would comply with the time restrictions and other relevant provisions in the PMC. Furthermore, noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Nonetheless, even with proposed mitigation measures, if nearby Related Project No. 19 and Related Project No. 48 were to be constructed concurrently with the proposed Project, significant and unavoidable cumulative construction noise impacts could result.

IX. Project Alternatives.

The City Council considered a range of reasonable alternatives for the proposed Project including, Alternative 1 – No Project Alternative, Alternative 2 – Reduced Density Alternative, Alternative 3 – Alternative Land Use, Alternative 4 – Alternative Design and Alternative 5 – Alternative Design.

In addition, the EIR identified alternatives that were considered for analysis but rejected as infeasible and briefly explained the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that were considered and rejected as infeasible include:

Development under Existing Zoning: Development consistent with the Project Site's existing zoning was considered but ultimately rejected as an alternative. If developed under the Project Site's existing zoning, this alternative would construct approximately 1,292,301 square feet of new development, which is approximately 100,000 square feet, or approximately 8.5 percent, more than the proposed Project. This increased development would result in greater

impacts with regard to traffic, air quality, climate change, noise, and public services. Therefore, this alternative would run counter to CEQA's stated purpose for an alternatives analysis which is to reduce the significant impacts of the Project. As such, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

Reduced Density (10, 20, 25, and 50 percent reduction): When considering alternatives for the Project, the City evaluated a wide range of density reductions for the Project, including reductions of 10, 20, 25, 33, and 50 percent. During the evaluation, it was determined that a reduction of 33 percent was found to be appropriate for further analysis. Reductions between 10 and 25 percent were determined to not be large enough to reduce impacts associated with development of the proposed Project and a reduction of 50 percent would not create a Project that responds to the scale of available development area on the Project Site and, thus, would not fully achieve the Project's objectives. As such, in accordance with Section 15126.6(f) of the State CEQA Guidelines, analyzing reduced density alternatives, other than a 33 percent reduction in development, are rejected from further consideration.

Alternative Land Use (All Commercial): An Alternative Land Use Alternative, which consisted of developing the Project Site entirely with commercial uses, was considered but ultimately rejected. The development of the Project Site with commercial uses would result in an increase in the intensity of on-site development and the amount of traffic traveling to and from the Project Site. This increase would result in greater impacts with regard to traffic, noise, air quality, and greenhouse gases. In addition, one of the basic objectives of the proposed Project is to increase the diversity of land uses in the Central District by creating a pedestrian-oriented, high-density development with a mix of uses. Development of only commercial uses would continue the existing trend of only commercial development within the Project Site and would not introduce any residential uses into the vicinity of the Project Site. Thus, development of an all commercial development would not reduce impacts or be consistent with the Project's objectives. Therefore, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative is rejected from further consideration.

Alternative Design (Flip development east-west): This Alternative Design Alternative, which was ultimately rejected, considered the relocation of the proposed Project's land uses. Under this alternative, residential and commercial land uses would be located on the west side of the development and commercial uses would be located on the east side along Fair Oaks Avenue. This alternative was ultimately rejected because it would have placed residential

units on the west side of the Project Site closer to the freeway, which would have resulted in greater air quality–related impacts. In addition, this alternative would eliminate the mixed-use identity, which was encouraged in the Project’s objectives, of the Project along Fair Oaks Avenue since only commercial uses would exist in this area under this alternative. Furthermore, one of the main objectives of the Project is to create a place where residents can circulate with reduced dependence on cars. As such, the relocation of residential uses to the west side of the Project Site would increase the distance between the residents and the Metro Gold Line adjacent to Memorial Park. Thus, this alternative would potentially conflict with this basic Project objective. As this is not a viable alternative, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative is rejected from further consideration.

Alternative Site: The Lead Agency initially considered, but ultimately rejected as infeasible, the development of the proposed Project at an Alternative Site. Under this alternative, the proposed Project would be constructed on an alternate site within the City of Pasadena. While development of the proposed Project on an alternative site was considered, this alternative was rejected because of a lack of available properties within the Central District that could accommodate the proposed Project. In addition, the Project Applicant owns the Project Site and does not own or control other property of a comparable size in the Central District or elsewhere in the City of Pasadena, nor is it reasonable to assume that a property of the same size would become available for the Project Applicant to acquire. The objectives of the Project are closely tied to the concept of providing a pedestrian-oriented, high-density development with a mix of uses in the Central District that reduces residents’ dependence on cars. No other site of this size in the City of Pasadena is located as centrally and as close to public transportation as the Project Site. Additionally, a basic and fundamental objective of the proposed Project is to redevelop the existing Project Site and weave the site back into the surrounding historic and mixed-use community of Old Pasadena. Thus, if the Project was located outside of the Central District in another part of Pasadena, a basic project objective could not be met under this alternative. As such, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative is rejected from further consideration.

Alternatives 1, 2, 3, 4 and 5 were analyzed in the EIR and are discussed below. In addition, the basis for rejecting each of these alternatives as infeasible is discussed.

A. ALTERNATIVE 1 – NO PROJECT

1. Summary of Alternative

Under this alternative, the Project would not be approved, no new permanent development would be introduced within the Project Site, and the existing environment would be maintained.

2. Reasons for Rejecting Alternative: Infeasibility

No new development would be introduced on the Project Site under Alternative 1, and the existing uses on the Project Site would continue to operate as they do currently. As a result, Alternative 1 would not meet the objectives to transform a suburban style campus defined by centralized buildings and surface parking in Old Pasadena into a pedestrian-oriented, high-density development with a mix of uses. Alternative 1 would also not meet the objectives of increasing patronage for Old Pasadena businesses nor develop “Class A” office space that would attract new companies to the City as well as stem the loss of existing large companies and employers from leaving the City. Nor would Alternative 1 meet the objective to facilitate travel across the Project Site by improving and extending Holly Street and restoring Holly Street in accordance with the intent of the original Bennett Plan by extending the visual linkages between City Hall and the Project Site. Alternative 1 would also not create linkages between the Project Site and Old Pasadena, expand upon the adjacent mixed use fabric of the City, or develop open space systems that support an environmentally integrated development. Additionally, project design features that respond to the local climate and weather through the use of passive design strategies would not be constructed under Alternative 1 and, thus, another objective would not be met. Furthermore, Alternative 1 would not create new buildings and open spaces that are compatible with Old Pasadena’s architecture and the existing Parson’s building. Overall, Alternative 1, the No Project Alternative, would not meet the Project’s objectives.

The City Council hereby finds that the reason set forth above for rejecting Alternative 1 as infeasible, by itself, and independent of any other reason, justifies rejection of Alternative 1.

B. ALTERNATIVE 2 – REDUCED DENSITY

1. Summary of Alternative

Under this Alternative, development would decrease by 33 percent, resulting in a development program consisting of 318 residential units, 415,400 square feet of office uses, and 6,700 square feet of restaurant floor area. While development would be reduced, this reduction would occur by reducing building heights by 33 percent. The extent of site coverage under Alternative 2, including landscaping and open space, would remain the same as the proposed Project. The subterranean parking structure would also be constructed under the Reduced Density Alternative including replacement parking for the existing surface parking lots, although a commensurate reduction in parking spaces is expected due to reduced project development. Similar to the proposed Project, the Reduced Density Alternative includes improving and extending Holly Street as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue. Additionally, streetscape improvements would be constructed along Holly Street and Leonard J. Pieroni Street, between the new on-site segment of Holly Street and Union Street.

2. Reasons for Rejecting Alternative: Infeasibility

Overall, the Reduced Density Alternative would meet most of the Project's objectives. Although reduced in density, Alternative 2 would still transform the existing suburban style campus into a pedestrian-oriented, higher-density development with a mix of uses. Like the proposed Project, the Reduced Density Alternative would create new buildings and open spaces that are compatible with Old Pasadena's architecture and the existing Parsons building. Furthermore, Alternative 2 would facilitate a pedestrian oriented environment by providing public spaces and pathways, by improving and extending Holly Street, and would visually link City Hall to the Project Site, in accordance with the Bennett Plan. However, Alternative 2 would not meet the Project objectives to the same extent as the Project with regard to providing Class "A" office space to stem the loss of existing Pasadena businesses and attract new companies to the City as well as increasing the number of on-site employees and residents that would be available to patronize businesses in Old Pasadena.

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

C. **ALTERNATIVE 3 – ALTERNATIVE LAND USE**

1. Summary of Alternative

Under Alternative 3, residential units, including work/live units along Fair Oaks Avenue, would replace the proposed commercial office uses on the Project Site. Furthermore, landscaping and open space would be modified to provide for a mostly residential community and the number of parking spaces in the subterranean parking garage would be modified and provided according to the number of proposed residential units, restaurant space, and replacement parking to support the existing on-site commercial use. Additionally, Holly Street would be improved and extended as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue and streetscape improvements would be constructed along Holly Street and Leonard J. Pieroni Street, between the new on-site segment of Holly Street and Union Street.

2. Reasons for Rejecting Alternative; Infeasibility

Overall, Alternative would meet some of the Project's objectives. Development proposed under Alternative 3 would consist primarily of residential uses with a relatively limited amount of restaurant floor area. This alternative would not include commercial office or retail uses and, thus, would not meet the objective that seeks to transform the existing suburban style campus into a pedestrian-oriented, higher-density development with a mix of uses. Furthermore, Alternative 3 would not meet the Project objectives with regard to providing Class "A" office space to stem the loss of existing Pasadena businesses and attract new companies to the City. Like the proposed Project, Alternative 3 would create new buildings and open spaces that are compatible with Old Pasadena's architecture and the existing Parsons building. In addition, Alternative 3 would facilitate a pedestrian oriented environment by providing public spaces and pathways, by improving and extending Holly Street, and would visually link the Project Site to City Hall to a greater extent than under current conditions, in accordance with the Bennett Plan.

The City Council hereby finds that the reason set forth above as grounds for rejecting Alternative 3 as infeasible, by itself, and independent of any other reason, would justify rejection of Alternative 3 as infeasible.

D. ALTERNATIVE 4 – ALTERNATIVE DESIGN (FLIP RESIDENTIAL/ COMMERCIAL LAND USES ON FAIR OAKS)

1. Summary of Alternative

Under this Alternative, the development proposed within Development Areas A and B would be reversed so that the 620,000 square feet

of commercial office uses and 10,000 square feet of restaurant floor area would be located on the south end of the Project Site along Fair Oaks Avenue and Holly Street and the 475 residential units would be located on the north end of the Project Site along Fair Oaks Avenue and Walnut Street. Although the location of these uses would be reversed, the square footage and the number of residential units would remain the same as under the proposed Project. Additionally, landscaping, open space, parking, and circulation would remain the same as under the proposed Project. Similar to the proposed Project, Alternative 4 includes improving and extending Holly Street as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue. In addition, streetscape improvements would be constructed along Holly Street and Leonard J. Pieroni Street, between the new on-site segment of Holly Street and Union Street.

2. Reasons for Rejecting Alternative; Infeasibility

Development proposed under Alternative 4 would be the same as under the Project with the exception of the location of the residential and commercial uses along the Project Site's Fair Oaks Avenue frontage. This change in the configuration of on-site land uses has no effect on the extent to which Alternative 4 meets the objectives of the Project. As such, Alternative 4 would meet all the objectives of the Project.

While there are some minor variations in impacts when the location of the residential and commercial uses along the Project Site's Fair Oaks Avenue frontage are reversed, this change in the configuration of on-site land uses does not reduce or eliminate any of the Project's significant impacts, and increases potential impacts related to exposure of future residents to Toxic Air Contaminants. As a result, the impacts of Alternative 4, would be greater than those of the Project because of the additional potential impact related to Toxic Air Contaminant exposure to the relocated residential buildings' occupants. Therefore, the City Council rejects this alternative because it would result in more impact, and in particular could result in toxic air contamination impacts on future occupants of residential units.

E. ALTERNATIVE 5 – ALTERNATIVE DESIGN (VERTICAL MIXED-USE)

1. Summary of Alternative

Under this Alternative, the Project's proposed restaurant uses would replace the proposed work/live units and the residential amenity area fronting Fair Oaks Avenue in Development Area A. Residential uses, as is the case with the proposed Project, would be developed above these street front uses, thereby creating a vertical mixed-use

configuration for this portion of the Project Site. With the relocation of the restaurant uses from Development Area B to Development Area A under this alternative, Development Area B would be developed with office uses only. Under Alternative 5, no changes are proposed for Development Area C. Additionally, landscaping, open space, parking, and circulation would remain the same as under the proposed Project. Similar to the proposed Project, Alternative 5 includes improving and extending Holly Street as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue. In addition, streetscape improvements would be constructed along Holly Street and Leonard Pieroni Street, between the new on-site segment of Holly Street and Union Street.

2. Reasons for Rejecting Alternative; Infeasibility

Development proposed under Alternative 5 would be the same as under the Project with the exception of the replacement of the Project's work/live units and residential amenity area with restaurant uses along Fair Oaks Avenue in Development Area A. This change in the configuration of on-site land uses has no affect on the extent to which Alternative 5 meets the objectives of the Project. However, Alternative No. 5 does not reduce any significant impacts of the Project, and is thus rejected because it is not environmentally superior to the proposed Project.

F. Environmentally Superior Alternative

The City Council find that Alternative 2 (reduced density) is the environmentally superior alternative. For the reasons set forth above, the City Council nonetheless rejects Alternative 2.

EXHIBIT B

Mitigation Monitoring and Reporting Program

Mitigation Monitoring and Reporting Program

A. Purpose

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act. It is the intent of this program to (1) verify satisfaction of the required project design features and mitigation measures of the EIR; (2) provide a methodology to document implementation of the required project design features and mitigation measures; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of the project design features and mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes wherever feasible.

B. Introduction

The MMRP describes the procedures that will be used to implement the project design features and mitigation measures adopted in connection with the approval of the project and the methods of monitoring such actions. Table 1, Mitigation Monitoring and Reporting Program Matrix, starting on page 2, sets forth the responsible entity for monitoring, the timing, and a list of all Project-related project design features and mitigation measures. Unless otherwise noted, all references under the heading of "Responsible Monitoring Entity" refers to City of Pasadena departments.

**Table 1
Mitigation Monitoring and Reporting Program Matrix**

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Compliance Verification		
				Initial	Date	Comments
Land Use						
No mitigation measures required.						
Transportation						
<p>Project Design Feature B.1-1: Construction of Holly Street between Fair Oaks Avenue and Pasadena Avenue.</p> <p>The Project proposes to replace the east-west segment of Leonard J. Pieroni Drive with a new street that would extend Holly Street westerly from Fair Oaks Avenue to directly connect to Pasadena Avenue. This new street would improve circulation within this portion of the Central District by providing an additional east-west connection to serve local traffic as well as providing access to the regional transportation system via Pasadena Avenue.</p> <p>The new street would be privately owned but built to public street standards. The new on-site segment of Holly Street would be constructed to provide one through travel lane in each direction, a center turn lane, a parking lane and a bike lane on the north side of the street, as well as sidewalks on both sides of the street. Within the sidewalk areas the Project proposes landscaping and street lights. Figure III-8 in Section III, Project Description, of this Draft EIR provide the conceptual alignment for Holly Street, including travel lanes, bicycle and parking lane, driveways, traffic control, and bus stop relative to existing conditions. Figure III-9 in Section III, Project Description, of this Draft EIR depicts the conceptual cross-section for the extension of Holly Street across the Project Site.</p> <p>Based on this proposed design, these streetscape enhancements would facilitate the operation of Holly Street as a vehicular, pedestrian, and bicycle facility. The proposed streetscape improvements would also serve as a pedestrian</p>	During construction of Holly Street between Fair Oaks Avenue and Pasadena Avenue	Departments of Public Works and Transportation				

**Table 1 (Continued)
Mitigation Monitoring and Reporting Program Matrix**

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Compliance Verification		
				Initial	Date	Comments
<p>corridor connecting Fair Oaks Avenue to Pasadena Avenue and enhance on-site pedestrian connections to Old Pasadena. The proposed streetscape improvements would also facilitate access to the on-site transit kiosk which would be implemented via Mitigation Measure B.1-5. The bicycle lanes proposed as part of the streetscape improvements would connect with the existing bicycle lane on Pasadena Avenue and the Project's proposed on-site network of bicycle amenities which would facilitate bicycle access to all areas within the Project's North Development Area.</p>						
<p>Project Design Feature B.1-2: Realignment and reconfiguration of Leonard J. Pieroni Street.</p> <p>As part of Project development during Phase 1, Leonard J. Pieroni Street is re-envisioned as a pedestrian-oriented street that connects the North Development Area to Old Pasadena. This proposed improvement affects the north-south segment of Leonard J. Pieroni Street that intersects with Union Street and which continues as De Lacey Avenue south of Union Street. The street currently lacks a sidewalk on the east side of the street, which limits walkability and pedestrian connections to Old Pasadena.</p> <p>The realigned street would remain privately owned but would be reconstructed to public street standards. The reconfiguration of Leonard J. Pieroni Street includes realignment of the street to the west. The reconstructed north-south segment of Leonard J. Pieroni Street would provide one through travel lane in each direction and sidewalks on either side of the street. The realignment would create sufficient space to construct landscaped pedestrian sidewalks on both sides of the street. Streetscape improvements include enhanced lighting and a landscape parkway between the sidewalk and the roadway to create a</p>	<p>During construction of the realignment and reconfiguration of Leonard J. Pieroni Street</p>	<p>Departments of Public Works and Transportation</p>				

Table 1 (Continued)
Mitigation Monitoring and Reporting Program Matrix

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Compliance Verification		
				Initial	Date	Comments
safety buffer between vehicles and pedestrians. In addition to providing improved pedestrian access within this portion of the Project Site, the improved streetscape environment would also encourage and provide an aesthetically pleasing pedestrian connection between the Project Site and Old Pasadena. Figure III-8 in Section III, Project Description, of this Draft EIR depicts the conceptual alignment, striping, and traffic control relative to existing conditions for the north-south segment of Leonard J. Pieroni Street. Figure III-9 in Section III, Project Description, of this Draft EIR depicts the conceptual cross-section for the north-south segment of Leonard J. Pieroni Street.						
Project Design Feature B.1-3: The Project proposes to modify the southbound approach to the Fair Oaks Avenue and Union Street intersection to improve the pedestrian environment and create additional green space. This would be accomplished by removing the existing concrete island and modifying the existing curb and southbound right turn only lane at the intersection. Implementation of this improvement would maintain the same number of through and turn lanes at the intersection.	During construction of the subject section of Fair Oaks Avenue	Departments of Public Works and Transportation				
Project Design Feature B.1-4: The Project proposes sidewalk widths of a minimum of 12 feet on Fair Oaks Avenue and Walnut Street.	During construction of sidewalks on Fair Oaks Avenue and Walnut Street	Departments of Public Works and Transportation				
Project Design Feature B.1-5: The Project proposes the construction of three paseo-lined streets that would provide both vehicular and pedestrian access to the Project Site. The three paseo-lined streets would serve as the primary access for vehicles to enter the Project Site and access the on-site parking garages. One paseo-lined street would connect to Fair Oaks Avenue as well as another to Pasadena Avenue and a third to the on-site segment of Holly Street that would	During construction of each of the three proposed paseo-lined streets	Departments of Public Works and Transportation				

Table 1 (Continued)
Mitigation Monitoring and Reporting Program Matrix

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Compliance Verification		
				Initial	Date	Comments
<p>be constructed as part of the Project. The paseo-lined street on Fair Oaks Avenue is anticipated to be located between Development Areas A and B, whereas the paseo-lined street that connects to the on-site segment of Holly Street is anticipated to be located so as to create a 4-way intersection with the realigned Leonard J. Pieroni Street. The paseo-lined streets would provide a minimum of one travel lane in each direction, 10 feet of sidewalks for pedestrian access, and may include landscaped areas. The three proposed paseo-lined streets, as well as the continued use of the two existing driveways on Walnut Street, that are located on either side of the existing Walnut Street Plaza, would provide access to the subterranean parking facility located in the North Development Area. As such, there would not be direct access to the proposed on-site subterranean parking facility from the streets that border this portion of the Project Site (i.e., Fair Oaks Avenue, Pasadena Avenue, and the on-site segment of Holly Street between Fair Oaks and Leonard J. Pieroni Street).</p>						
<p>Project Design Feature B.1-5a (Numbered Project Design Feature B.1-5 in the Draft EIR): The Project's design includes a pedestrian infrastructure network that consists of the following three major components: (1) minimum sidewalk widths for the streets along the perimeter of the North Development Area; (2) enhanced streetscape designs for the proposed on-site segments of Holly Street and Leonard J. Pieroni Street; and (3) on-site network of paseos.</p> <p>Sidewalks for the streets along the perimeter of the North Development Area would be a minimum of 10 feet in width. The enhanced streetscapes for the proposed on-site segment of Holly Street and Leonard J. Pieroni Street would include 10-foot landscaped sidewalks on both sides of both streets which would facilitate pedestrian travel across the Project Site</p>	<p>During construction of the Project's pedestrian infrastructure network</p>	<p>Departments of Public Works and Transportation</p>				

Table 1 (Continued)
Mitigation Monitoring and Reporting Program Matrix

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Compliance Verification		
				Initial	Date	Comments
and enhance pedestrian connections with Old Pasadena. The network of paseo-lined streets together with other pedestrian pathways on-site would create links between the various buildings as well as the primary and secondary open space areas within the Project Site.						
Project Design Feature B.1-6: The Project's design includes a bicycle infrastructure network that consists of the following two major components: (1) bicycle lane on the north side of the proposed on-site segment of Holly Street that would connect with the existing bicycle lane on Pasadena Avenue; and (2) the Project's proposed on-site network of bicycle amenities which would facilitate bicycle access to all areas within the North Development Area.	During construction of the Project's bicycle infrastructure network	Departments of Public Works and Transportation				
Project Design Feature B.1-7: Tenant and emergency vehicle access would be maintained to all areas of the Project Site during all phases of Project construction.	During all phases of Project construction	Departments of Public Works and Transportation				
Mitigation Measure B.1-1: Transportation Demand Management Program. The Project Applicant, or successor in interest, shall develop a TDM Program that includes a combination of the following strategies, or equivalent measures, as approved by the City's Department of Transportation: <ul style="list-style-type: none"> • Flexible work schedules, telecommuting programs and alternative work schedules; • Participation in an existing or formation of a new Transportation Management Association (TMA); • Pedestrian/bicycle-friendly environment; • Pedestrian Improvements; • Bike Share Program including public bike share kiosk; • Bicycle amenities (bicycle racks, etc.); 	Prior to issuance of Certificate of Occupancy for the first development phase or individual project that would benefit from this mitigation measure	Building Department and Department of Transportation				

**Table 1 (Continued)
Mitigation Monitoring and Reporting Program Matrix**

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Compliance Verification		
				Initial	Date	Comments
<ul style="list-style-type: none"> • Rideshare/carpool/vanpool promotion and support; • Transportation Information Center (TIC) including education and information on alternative transportation modes and on-site transit kiosk; • Guaranteed Ride Home (GRH) program; • On-site flex cars; and • Transit passes (i.e. Bus Passes, EZ Pass, TAP cards) for residents and employees. 						
<p>Mitigation Measure B.1-2: Transportation Management Association.</p> <p>The Project Applicant, or successor in interest, shall facilitate the formation of a new on-site TMA or become part of an existing TMA in the Study Area. The TMA's objective shall be to create Transportation Management Plans (TMPs) and promote awareness of the available TDM strategies among employees, residents and patrons and potentially the broader public in the Study Area. The TMA initiatives shall include the following:</p> <ul style="list-style-type: none"> • Online Rideshare matching and Carpool/Vanpool Program; • Bike and walk to work promotions; • On-site Flex Car; • Guaranteed ride home; • Preferential load/unload or parking location for high occupancy vehicles (HOV); and • Transportation Information Center. 	Prior to issuance of Certificate of Occupancy for the first development phase or individual project that would benefit from this mitigation measure	Building Department and Department of Transportation				
<p>Mitigation Measure B.1-3: Transit Passes. The Project Applicant, or successor in interest, shall provide all eligible employees and residents monthly transit passes such as the EZ Transit TAP card or a modified version of the same to</p>	During Project operations	Department of Transportation				

Table 1 (Continued)
Mitigation Monitoring and Reporting Program Matrix

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Compliance Verification		
				Initial	Date	Comments
allow access to all transit lines including the Pasadena ARTS.						
Mitigation Measure B.1-4: Re-Routing of Pasadena ARTS Line 40. The Project Applicant, or successor in interest, shall coordinate with the City to re-route ARTS Line 40 via Holly Street to provide direct access to the transit line to and from the Project Site.	Prior to issuance of Certificate of Occupancy for the first development phase or individual project that would benefit from this mitigation measure	Building Department and Department of Transportation				
Mitigation Measure B.1-5: On-Site Transit Kiosk. The Project Applicant, or successor in interest, shall provide an on-site transit kiosk that may include "Next Bus" or a similar Transit System Real-Time Information system. "Next Bus" Real-Time information regarding bus location and status shall be available over the internet and at bus stops. The buses shall be equipped with GPS (global positioning system) or other vehicle tracking system devices and communications systems in order to be able to provide the "Next Bus" location and status input and to respond to calls from the extended service areas in real-time.	Prior to issuance of Certificate of Occupancy for the first development phase or individual project that would benefit from this mitigation measure	Building Department and Department of Transportation				
Mitigation Measure B.1-6: The Project Applicant, or successor in interest, shall provide pedestrian lighting on both sides of the street along Holly Street from the Project Site to the Memorial Park Metro Gold Line Station (Arroyo Parkway) in accordance with the provisions of the Old Pasadena Streetscapes and Alley Walkways Plan and Elements. The location of this improvement is identified in Figure IV.B.1-20 on page V.B.1-82 (Reprinted and included in Appendix A of this MMRP).	During construction of the pedestrian lighting along Holly Street from the Project Site to the Memorial Park Metro Gold Line Station (Arroyo Parkway)	Departments of Public Works and Transportation				
Mitigation Measure B.1-7: The Project Applicant, or successor in interest, shall provide sidewalk improvements, such as repairing cracks and uneven sections adjacent to the	Prior to the completion of construction of each	Department of Public Works				

Table 1 (Continued)
Mitigation Monitoring and Reporting Program Matrix

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Compliance Verification		
				Initial	Date	Comments
Project Site. The location of the area subject to this mitigation measure is shown in Figure IV.B.1-20 on page IV.B.1-82 (Reprinted and included in Appendix A of this MMRP).	development phase or individual project					
Mitigation Measure B.1-8: The Project Applicant, or successor in interest, shall provide audio tactile pedestrian heads for vision-impaired pedestrians and provide pavement treatments (i.e., special pavement textures, paint designs) at crosswalks at the intersections of Corson Street/Walnut Street, Pasadena Avenue/Union Street, De Lacey Avenue/Union Street, Fair Oaks Avenue/Walnut Street, Fair Oaks Avenue/Holly Street, and Fair Oaks Avenue/Union Street. The location of these improvements is shown in Figure IV.B.1-20 on page IV.B.1-82 (Reprinted and included in Appendix A of this MMRP).	Prior to the completion of construction of the first development phase or individual project that would benefit from this mitigation measure	Department of Transportation				
Mitigation Measure B.1-9: The Project Applicant, or successor in interest, shall improve the north leg of the intersection of Fair Oaks Avenue and Union Street to shorten the pedestrian crossing distance.	Prior to the completion of construction of the first development phase or individual project that would benefit from this mitigation measure	Departments of Public Works and Transportation				
Mitigation Measure B.1-10: The Project Applicant, or successor in interest, shall provide a crosswalk on the north leg of the intersection at Fair Oaks Avenue and Holly Street to improve pedestrian connections in the vicinity of the Project Site. This proposed improvement is shown in Figure IV.B.1-20 on page IV.B.1-82 (Reprinted and included in Appendix A of this MMRP)	Prior to the completion of construction of the first development phase or individual project that would benefit from this mitigation measure	Departments of Public Works and Transportation				
Mitigation Measure B.1-11: The Project Applicant, or successor in interest, shall provide an on-site pedestrian way-	Prior to issuance of Certificate of	Building Department and				