RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT (SCH NO. 2016091009) FOR THE ARTCENTER MASTER PLAN, AND ADOPTING ENVIRONMENTAL FINDINGS AND A MITIGATION MONITORING AND REPORTING PROGRAM

WHEREAS, the ArtCenter Master Plan as studied in the EIR (the "Project")[1] proposes a two-phase 15-year Master Plan for its Hillside Campus and South Campus. Hillside Campus, Phase I includes demolition, renovations and additions to existing buildings; installation of photovoltaic solar canopies on the existing parking lots; modifications to the parking and circulation plan. Hillside Campus, Phase II includes reconstruction and additions to the maintenance building. South Campus, Phase I includes construction of two eight-story, 100-foot tall, buildings for academic programs and student housing; elevated open "quad" area over the Metro Gold Line; mobility hub below the quad area; renovation and internal floor area addition to an existing two-story building; renovation of an existing six-story building (1111 S. Arroyo Pkwy.) for academic purposes, and installation of an 8,000 square foot digital gallery on the southeastern façade of 1111 S. Arroyo Pkwy. South Campus, Phase II includes demolition of a one-story building and construction of four eight-story, 100-foot tall, buildings for academic programs and/or student housing and an elevated "quad" area. Upon completion, total enrollment would increase from 2,000 full-time equivalent (FTE) students to 2,500 FTE students and increase faculty/staff from 753 to 994 between the two campuses; and

WHEREAS, the City of Pasadena is the lead agency for the project pursuant to the California Environmental Quality Act ("CEQA," Cal. Pub. Res. Code §21000 *et seq.*), State CEQA Guidelines (the "Guidelines," 14 Cal. Code Regs. §15000 *et seq.*), and the City's local environmental policy guidelines; and

WHEREAS, pursuant to CEQA Guidelines Section 15063, the City prepared an Initial Environmental Study (the "Initial Study") for the project (see Appendix A of the Draft EIR). The Initial Study concluded that there was substantial evidence that the Project

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[1] *It is important to note that the Master Plan and related permits as proposed for approval by the City Council does not include the digital gallery, although the potential environmental effects of the digital gallery were studied in the EIR.*

might have a significant environmental impact on the following resource areas: (1) Aesthetics; (2) Air Quality; (3) Biological Resources; (4) Cultural and Tribal Cultural Resources; (5) Geology and Soils; (6) Greenhouse Gas Emissions; (7) Hazards and Hazardous Materials; (8) Hydrology and Water Quality; (9) Land Use; (10) Noise; (11) Public Services (Fire Protection); (12) Traffic; and (13) Utilities (Water Supply and Infrastructure, Wastewater, Solid Waste, and Energy); and

WHEREAS, pursuant to CEQA Guidelines Sections 15064 and 15081, and based upon the information in the Initial Study, the City ordered the preparation of an environmental impact report ("EIR") for the project. On September 2, 2016, the City prepared and sent a Notice of Preparation (NOP) of the Draft EIR and a copy of the Initial Study to responsible, trustee, and other interested agencies and persons in accordance with CEQA Guidelines Sections 15082(a) and 15375; and

WHEREAS, pursuant to CEQA Guidelines Section 15082, the City solicited comments from potential responsible and trustee agencies for a 30-day period, from September 2, 2016, to October 3, 2016, requesting details about the scope and content of the environmental information related to the responsible agency's area of statutory responsibility that should be studied in the EIR, as well as the significant environmental issues, reasonable alternatives and mitigation measures that the responsible agency would have analyzed in the Draft EIR. Two public scoping meetings were held on September 20, 2016, and September 28, 2016, to determine the scope and content of the environmental information to be included in the Draft EIR. Comments received during the scoping period are contained in Appendix A of the Draft EIR; and

WHEREAS, pursuant to Public Resources Code section 21092, the City provided a public Notice of Completion and Availability ("NOA") of the Draft EIR (State Clearinghouse No. 2016091009) on October 26, 2017, through mailing to all property owners within 500 feet of the project, and to a list of agencies and interested persons. The NOA was also filed with the County Clerk. The NOA also gave notice of a public hearing before the City Planning Commission on November 8, 2017, at which comments on the Draft EIR were received. Copies of the Draft EIR were also placed at the City's Planning and Development Department at 175 North Garfield Avenue, at the Central Library at 285 East Walnut Street, at the Linda Vista Branch Library on Bryant Street, at the Allendale Branch Library on Marengo Street and on the City's website; and

WHEREAS, the Draft EIR was submitted to the State Clearinghouse and circulated, together with technical appendices, to the public and other interested persons for a 46-day public comment period commencing on October 26, 2017, and ending on December 11, 2017. The comment period was extended by seven days and officially ended on December 18, 2017. During the comment period, the Planning Commission held a special public hearing on November 8, 2017, to provide comments on the Draft EIR and to receive comments from the public on the Draft EIR; and

WHEREAS, during the aforementioned public comment periods the City received written and oral comments on the Draft EIR, and consulted with all responsible and trustee agencies, and other regulatory agencies pursuant to CEQA Guidelines Section 15086; and

WHEREAS, the City subsequently prepared written responses to all written comments received on the Draft EIR and made revisions to the Draft EIR, as appropriate, in response to those comments. The City distributed written responses to comments on the Draft EIR on April 25, 2018, in accordance with the provisions of Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088. The written responses to comments were also made available for a 10-day period of public review before the commencement of the public hearings regarding the certification of the Final EIR; and

WHEREAS, the EIR is comprised of the Draft EIR including clarifications, revisions, and corrections thereto; and the comments and responses to comments on the Draft EIR set forth in the Final EIR dated April 25, 2018; and

WHEREAS, at its duly noticed public meeting on May 9, 2018, the Planning Commission fully reviewed and discussed the proposed Master Plan, and recommended the City Council: 1) Certify the Final Environmental Impact Report (SCH# 2016091009) (Attachment C) and adopt the Mitigation Monitoring and Reporting Program for the proposed ArtCenter College of Design Master Plan project; 2) Adopt the findings in Attachment A and approve the Master Plan, Minor Conditional Use Permit for Reduced Parking, Minor Conditional Use Permit for Tandem Parking, and Private Tree Removals, with conditions of approval; 3) Adopt the findings in Attachment A for a Zoning Map Amendment to change the zoning designation of the properties located at 870 and 888 S. Raymond Ave. from Industrial General, South Fair Oaks Specific Plan, Height Limit 56 feet (IG-SP-2-HL-56) and 1111 South Arroyo Parkway from Central District Specific Plan, Arroyo Corridor/Fair Oaks (CD-6) to Public and Semi-Public (PS), respectively; 4)

Approve the findings in Attachment A to amend Section 17.48.060 (Signs—Master Sign Plan) Zoning Code to allow Outdoor Electronic Signs; 5) Adopt a Resolution allowing construction activities above and below the Metro Gold Line to occur outside the hours specified in Section 9.36.070.B. (Construction Projects—Noise Ordinance) of the Pasadena Municipal Code; 6) Adopt the findings in Attachment A to approve a Development Agreement for the project; and 7) Direct the City Attorney to prepare an ordinance within 60 days amending the official Zoning Map of the City of Pasadena established by Section 17.20.020 of Title 17 of the Pasadena Municipal Code (Zoning Code) to implement the zone change; and

WHEREAS, at its duly noticed public meeting on July 16, 2018, the City Council fully reviewed and discussed the Project; and

WHEREAS, the findings made in this resolution are based upon the information and evidence set forth in the Draft EIR dated October 2017, the Final EIR dated April 2018 and upon other substantial evidence that has been presented at all public meetings regarding the project and in the record of the proceedings. The documents, staff reports, technical studies, appendices, plans, specifications, and other materials that constitute the record of proceedings on which this resolution is based are on file and available for public examination during normal business hours in the Planning & Community Development Department at 175 North Garfield Avenue, Pasadena, California 91101 and with the Director of Planning & Community Development, who serves as the custodian of these records; and

WHEREAS, the City Council finds that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the Final EIR and that the comment process has fulfilled all requirements of State and local law; and

WHEREAS, the City Council, as the decision-making body for the lead agency with regard to this project, has independently reviewed and considered the contents of the Final EIR, and all documents and testimony in the record of proceedings prior to deciding whether to certify the Final EIR; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, the City Council of the City of Pasadena resolves as follows:

I. RESOLUTION REGARDING CERTIFICATION OF THE EIR

Pursuant to State CEQA Guidelines Section 15090, the City Council certifies that: (1) it has reviewed and considered the Final EIR prior to approving the project; (2) the Final EIR is an accurate and objective statement that fully complies with CEQA, the State CEQA Guidelines, the City's local environmental guidelines; and (3) the Final EIR reflects the independent judgment of the lead agency. The City Council certifies the Final EIR based on the findings and conclusions herein.

The City Council finds that the additional information provided in the staff report, in the comments (and any responses thereto) received after circulation of the Draft EIR, in the evidence presented in written and oral testimony presented at public meetings, and otherwise in the administrative record, does not constitute new information requiring recirculation of the Final EIR under CEQA. None of the information presented to the City Council after circulation of the Draft EIR has deprived the public of a meaningful opportunity to comment upon a substantial environmental impact of the project or a feasible mitigation measure or alternative that the City has declined to implement.

II. RESOLUTION REGARDING ENVIRONMENTAL IMPACTS NOT ANALYZED IN THE EIR

The City Council hereby finds that the following potential environmental impacts of the project were found to be less than significant in the Initial Study, did not require the imposition of mitigation measures, and therefore did not require study in the EIR: (1) Aesthetics (related to scenic resources within a state scenic highway); (2) Agricultural and Forest Resources; (3) Air Quality (related to objectionable odors); (4) Biological Resources (related to conflicting with local polices or ordinances protecting biological resources and conflicting with an adopted Habitat Conservation Play, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan); (5) Cultural Resources (related to paleontological resources); (6) Energy (related to conflicting with adopted energy conservation plans); (7) Geology and Soils (related to seismic-related ground failure, including liquefaction, substantial soil erosion or loss of top soil, and soil suitability for septic systems); (8) Hazards and Hazardous Materials (related to location within an airport land use plan or near a private airstrip, impairment of an adopted emergency response plan or

emergency evacuation plan, and exposure to wildland fires); (9) Hydrology and Water Quality (related to placement of housing or structures within a 100-year flood hazard area or exposure to flooding as a result of the failure of a levee or dam); (10) Land Use and Planning (related to physical division of an established community or conflicting with any applicable habitat conservation plan or natural community conservation plan); (11) Mineral Resources; (12) Noise (related to location near airport or airstrip resulting in excessive noise levels); (13) Population and Housing; (14) Public Services (related to libraries, parks, police protection, schools, and other public facilities); (15) Recreation (related to deterioration of parks or other recreational facilities); (16) Transportation/Traffic (related to air traffic patterns and emergency access); and (17) Utilities and Service Systems (compliance with statutes and regulations regarding solid waste). Refer to the Initial Study included as Appendix A of the Draft EIR.

III. RESOLUTION REGARDING ENVIRONMENTAL IMPACTS DETERMINED BY THE EIR TO BE LESS THAN SIGNIFICANT WITHOUT MITIGATION

The City Council finds that the Project will have no impact or a less than significant impact without mitigation on each of the topics set forth below. For some of these topics, compliance with applicable regulatory requirements is assumed, as discussed in the EIR, which would ensure that impacts remain less than significant. For each topic, the discussion begins with a delineation of the potential impacts evaluated in the EIR, as specifically related to that topic, along with page citations as to where in the EIR the relevant discussion is found, and is followed by an explanation of the substantial evidence in support of the EIR conclusion that a significant impact would not occur.

A. Aesthetics

1. Potential Impacts Evaluated

- Would the project substantially degrade the existing visual character or quality of the site and its surroundings? (Draft EIR, p. IV.A-30.)

- Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Draft EIR, p. IV.A-31.)

- Would the project substantially shade shadow-sensitive uses? (Draft EIR, p. IV.A-31.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the Project would not result in significant impacts related to aesthetics. Impacts would be less than significant, and no mitigation measures are required.

4. Supporting Explanation

a. Scenic Vistas and Visual Quality

The proposed improvements within the Hillside Campus are limited to renovations and additions to existing buildings, installation of photovoltaic (PV) solar cells and canopies at the North Lot and South Lot, and modifications to campus access. These improvements would not be visible from adjacent public rights-of-way, such as Lida Street, or from the immediately adjacent residential area to the north (i.e., along Pegfair Estates Drive). Accordingly, construction activities would not be visible to motorists on adjacent streets. In addition, these improvements would not be visually perceptible from those private residences located 0.4 mile to the north and northeast of the Hillside Campus. While construction would alter the visual appearance of the South Campus and its immediate vicinity on a temporary basis, Project construction activities would not substantially alter or degrade the existing visual character and quality of the South Campus and its surroundings or introduce elements that generate substantial long-term contrast with or substantially detract from the visual character of the surrounding area for the following reasons: (1) views of construction activities would be limited in duration and location; (2) the site appearance would be typical of construction sites in urban areas; (3) construction would occur within an urban setting with a high level of human activity and development; and (4) impacts would be reduced through standard best management practices (BMPs) implemented during the construction period. In addition, the Project would include the installation of temporary construction fencing along the periphery of the South Campus to screen much of the construction activity from view at the street level, as provided in Project Design Feature A-1. Furthermore, as set forth in Project Design Feature A-2, any pedestrian walkways and construction fencing accessible to the public would be monitored for graffiti removal throughout the construction period. Construction-

related aesthetic impacts associated with scenic vistas and visual character would be less than significant. (Draft EIR, pp. IV.A-32 and IV.A-33.)

The topography of the area and the dense vegetation naturally block most views of the Hillside Campus from the surrounding residential areas. When compared to existing conditions, the proposed improvements within the Hillside Campus do not result in a perceptible change in views of the Hillside Campus or the background, including, but not limited to, Scholl Canyon and the Los Angeles Basin in the horizon. Some of the proposed PV panels and canopies at the North Lot and South Lot may be minimally visible, but all other proposed improvements, including the enclosure of the Sinclaire Pavilion, the expansion of the South Building, and modifications to the Hillside Campus entrance and circulation, would not be visible from the surrounding area. Although the installation of the proposed PV panels and canopies at the North Lot and South Lot may alter the visual character of the Hillside Campus by replacing parking lot trees, this change in visual character would be internal to the Hillside Campus and would not be visible from any public right-of-way. Therefore, impacts to a scenic vista or the visual character or visual quality of the community as a result of the proposed improvements at the Hillside Campus would be less than significant. (Draft EIR, p. IV.A-34; see also Final EIR, Topical Response No. 2, and Response to Comment No. 10-2.)

Visual simulations for the South Campus are provided in Figures IV.A-14 through 19. As shown therein, distant views of the San Gabriel Mountains are already partially blocked by existing intervening buildings and landscaping. In addition, more important views of the San Gabriel Mountains, such as those available from Arroyo and other public rights-of-way to the north, east, and west of the South Campus would not be eliminated from multiple other vantage points and would remain unaffected by the Project. Therefore, the development of the South Campus would not have a substantial adverse effect on a scenic vista, and impacts to valued views would be less than significant. (Draft EIR, p. IV.A-34 and IV.A-44; see also Final EIR, Response to Comment No. 8-11.)

The Project would alter the visual character of the South Campus by replacing portions of campus that currently contain a low-rise, low-density building at the 888 Parcel and surface lots with six new buildings that would be eight stories and extending up to 100 feet in height. However, the change in scale would be moderated by a high degree of articulation created by fenestration; variations in building planes and façade setbacks and projections; and a variety of surface materials, as identified in Project Design Feature A-9. These would be consistent with the requirements of the

design standards and guidelines established in the South Fair Oaks Specific Plan for the proposed 988 and 888 Buildings along Raymond Avenue and the design standards and guidelines established in the Central District Specific Plan for the proposed 1101 Building along Arroyo Parkway to reduce the visual effect of the height and massing from public vantage points and provide a pedestrian scale adjacent to the public streets. Furthermore, any street trees and private trees that may be affected would be trimmed and/or replaced, in accordance with the City's Tree Protection Ordinance and adopted street tree plans. In addition, within the South Campus, the Project would create different scaled, open spaces to support a variety of uses to enhance the public and private realms as they would be readily accessed from street front nodes along Raymond Avenue. Although the proposed buildings would exceed the height limit established for the South Campus, the Project would be consistent with the height of the existing 1111 Building and would also comply with other design standards and guidelines established in the South Fair Oaks Specific Plan and the Central District Specific Plan. In addition, the Project would be required to undergo the City's Design Review process to ensure the compatibility of the proposed buildings with existing and surrounding uses as it relates to architecture, materials, scale, massing, color, lighting, landscaping, open space and other design concepts. Furthermore, with approval of the Master Plan and the requested discretionary actions and permits, the Project would be consistent with the new height limit established for the South Campus. As such, development within the South Campus would not substantially detract from the visual character of the area. (Draft EIR pp. IV.A-44 and IV.A-45.)

The Project would also include a digital gallery that displays images representing a wide array of artwork and conceptual designs associated with ArtCenter on the façade of the 1111 Building of the South Campus. As set forth in Project Design Feature A-10, above, the proposed 8,000-square-foot digital gallery would display a combination of colors, still images, animations, and videos, with a change-rate of no less than six seconds. It would be located anywhere between the southeastern corner of the building and the northeastern corner of the building. The digital gallery would be designed such that nighttime luminance would not exceed 400 candelas per square meter (cd/m^2). Although atypical in Pasadena due to its size and digital nature, locating the digital gallery on the façade of the 1111 Building would not negatively impact the visual character or quality within this active portion of Pasadena that serves as a gateway to the City. In particular, there are no notable visual resources in the Project area. As such, the digital gallery would not be detrimental to the visual quality or character of the South Campus or surrounding area. The digital gallery would be visible from the northeast from the rears

of the upper floors of multi-family residences on the west side of Marengo Avenue approximately 370 feet from the South Campus. This is due to the higher elevation of Marengo Avenue compared to Arroyo Parkway. However, due to the development on the east side of Arroyo Parkway, these views would be partially obscured and, given the lack a definable aesthetic character in the project vicinity, would not result in a significant impact. There impacts of the digital gallery that are associated with visual quality and scenic views would be less than significant. (Draft EIR, pp. IV.A-45 and IV.A-46; see also Final EIR, Response to Comment No. 8-4.)

b. Light and Glare

The proposed improvements within the Hillside Campus are limited to the demolition of the Annex Building, renovations and additions to existing buildings, installation of PV solar cells and canopies at the North Lot and South Lot, and modifications to campus access. These improvements would not require nighttime construction. Within the South Campus, construction-related illumination during nighttime hours, including construction activities over and under the Metro right-of-way (ROW), would be shielded and/or aimed so that no direct beam spills over outside of the campus property boundary, as described in Project Design Feature A-3 above. Thus, Project impacts to off-site sensitive uses from lighting sources associated with construction activities would be considered less than significant. (Draft EIR, p. IV.A-46.)

With regard to daytime glare, it is unlikely that this would occur given the fact that large, flat surfaces, like those needed to generate glare, are typically not associated with construction activities. Moreover, any glare produced during construction activities would be highly transitory and short-term, given the movement of construction equipment and materials within the construction site and the temporary nature of construction activities. Furthermore, the Project would implement Project Design Feature A-3 above, which involves the shielding of construction-related light sources. Therefore, impacts to off-site sensitive uses from daytime and nighttime glare during construction would be considered less than significant. (Draft EIR, pp. IV.A-46 and IV.A-47; see also Final EIR, Topical Response No. 2: Solar Panels.)

c. Shading

Shadows in the Northern Hemisphere fall to the west, northwest, north, northeast, and east, depending on the season and time of day. No shade-sensitive uses are located

in proximity to the Hillside Campus or South Campus to the west, northwest, north, northeast, and east. Thus, no shading impacts would occur. (Draft EIR, p. IV.A-27.)

5. Cumulative Impacts

a. Scenic Vistas and Visual Quality

Each development project under the General Plan buildout, as well as the Project, would be required to be consistent with the policies in the General Plan Update and applicable City specific plans and design guidelines, specifically the Central District Specific Plan and the South Fair Oaks Specific Plan for the Project to ensure land use compatibility and context-sensitive design. In addition, no related projects are located near the Hillside Campus and none of the related projects within the same viewshed as the South Campus are large enough to contribute to the obstruction of the views of the San Gabriel Mountains. Therefore, a substantial portion of the views of the San Gabriel Mountains from the viewshed of the South Campus would remain unchanged from other public rights-of-way to the north, east, and west of the South Campus due to the already dense urban development with low- and mid-rise structures in the area with implementation of the related projects located within the same viewshed. The balance of the related projects and other development projects under the General Plan buildout would not cause significant cumulative visual impacts, as these developments are either not visible from the Project area due to distance and/or existing intervening development, or are located at such a distance so as not to figure prominently within views that include the South Campus. As such, cumulative impacts related to visual character, visual quality, and scenic vistas would be less than significant. (Draft EIR, p. IV.A-50.)

b. Light and Glare

According to the discussion of light and glare impacts presented in the 2015 Certified EIR for the Pasadena General Plan, development projects under the General Plan buildout would generate new sources of light and glare that could affect day or nighttime views in the City. However, it was determined that most of the development projects would occur in areas that already feature buildings, parking, streets, and other light-generating land uses. Therefore, it was concluded that additional light and glare resulting from implementation of development projects under the General Plan buildout would be incremental, rather than an expansion of the geographic range of impacts. In addition, the Project and each of the development projects under the General Plan buildout would be required to adhere to design standards in the Pasadena Municipal

Code (PMC) and other regulations to ensure that light and glare new development would be minimized. As such, cumulative impacts related to light and glare would be less than significant. (Draft EIR, p. IV.A-50 and IV.A-51.)

c. Shading

There are no shade-sensitive uses immediately adjacent to the Project Site. In addition, shade/shadow impacts are typically confined to a project site's immediate surroundings, and the related projects are too far from the project site to result in cumulative shade/shadow impacts in the vicinity of the Project. Therefore, no cumulative shade impacts would occur. (Draft EIR, pp. IV.A-27 through IV.A-50.)

B. Air Quality

1. Potential Impacts Evaluated

- Would the project conflict with or obstruct implementation of the applicable air quality plan? (Draft EIR, p. IV.B-29.)

- Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Draft EIR, p. IV.B-29.)

- Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? (Draft EIR, p. IV.B-29.)

- Would the project expose sensitive receptors to substantial pollutant concentrations? (Draft EIR, p. IV.B-29.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As explained below, the EIR analysis determined that implementation of the Project would not result in significant impacts related to air quality. Impacts would be less than significant and no mitigation measures are required.

4. Supporting Explanation

Violate An Air Quality Standard, Contribute to An Air Quality Violation, or Expose Sensitive Receptors to Substantial Pollutants

a. Construction

Construction of the Project would be conducted in two phases. Construction of Phase I is estimated to occur over approximately 24 to 36 months within a four-year period and may be completed as early as 2022. Construction of Phase II is estimated to extend ten years through 2032. However, the analysis presented below is conservative as it assumes that Phase II of construction would be completed in 2024. An earlier completion date generates more emissions as advancements in technology would not be realized. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. The regional emissions levels included in Section IV.B, Air Quality, of the Draft EIR represent the highest daily emissions projected to occur during each year of construction. As presented in Table IV.B-5 on page IV.B-35 of Section IV.B, Air Quality, of the Draft EIR, construction-related daily maximum regional construction emissions would not exceed any of the South Coast Air Quality Management District (SCAQMD) daily significance thresholds. Therefore, regional construction emissions resulting from the Project would result in a less-than-significant air quality impact. (Draft EIR, pp. IV.B-33 and IV.B-34; see also Final EIR, Response to Comment No. 3-3.) In addition, potential regional air quality impacts associated with overlapping construction and operational impacts would also be less than significant. (Final EIR, pp. II-3 and II-4 of Section II. Clarifications, Revisions, and Corrections to the Draft EIR, and Response to Comment Nos. 3-2 and 3.5.)

With regard to localized impacts associated with construction activities, look-up tables provided by the SCAQMD were used to determine localized construction emissions

screening thresholds for the Project.[2] Localized significance thresholds (LSTs) represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2013–2015) for the Project area presented in Table IV.B-2 on page IV.B-19 of Section IV.B, Air Quality, of the Draft EIR. Although the trend generally demonstrates that ambient air quality is improving in the area, the localized construction emissions analysis conservatively did not apply a reduction in background pollutant concentrations for subsequent years of construction. By doing so, the allowable pollutant increment to not exceed an ambient air quality standard is more stringent. Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for source receptor area (SRA) 8 based on construction site acreage of 5 acres. Potential impacts were evaluated at the closest sensitive receptor, which are residential uses 62 meters north of the Hillside Campus. However, for a conservative analysis, potential impacts at the residential uses were evaluated using the 50-meter mass rate LST lookup tables applied to both the Hillside Campus and South Campus. As presented in Table IV.B-6 on page IV.B-36 of Section IV.B, Air Quality, of the Draft EIR, maximum localized construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds. Therefore, localized construction emissions resulting from the Project would result in a less-than-significant air quality impact. (Draft EIR, pp. IV.B-34 and IV.B-35.)

With regard to Toxic Air Contaminants (TAC) associated with construction, the greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to the SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime would contract cancer based on the use of standard risk-assessment methodology. Because the construction schedule estimates the phases, which require the most heavy-duty diesel vehicle usage (e.g., site grading/excavation), would last for a much shorter duration (e.g., approximately 1.5 months), construction of the Project would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. Additionally, the SCAQMD CEQA Guidelines do not require a Health Risk Assessment (HRA) for short-

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[2] *SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-Up Table, revised October 2009.*

term construction emissions or provide recommendations or guidance for such an analysis. It was therefore, not necessary to evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. As such, Project-related TAC impacts during construction would be less than significant. (Draft EIR, p. IV.B-36.)

b. Operation

The SCAQMD's CalEEMod was used to calculate regional area, energy, mobile source, and stationary emissions. As shown in Table IV.B-7 in Section IV.B, Air Quality, of the Draft EIR, regional emissions resulting from operation of the Project would not exceed any of the SCAQMD's daily regional operational thresholds. Therefore, air quality impacts from Project regional operational emissions would be less than significant. In addition, as shown in Table IV.B-9 of the Final EIR, combined construction and operational emissions would be well below the SCAQMD's regional significance thresholds. (Draft EIR, p. IV.B-37; Final EIR p. II-4; see also Final EIR, Response to Comment No. 3-5.)

With regard to localized emissions, operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.B-8 in Section IV.B, Air Quality, of the Draft EIR. The SCAQMD LST mass rate look-up tables were used to evaluate potential localized impacts. In addition, maximum on-site daily operational emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 8 based on a site acreage of 5 acres for a screening-level analysis. As shown in Table IV.B-8 in Section IV.B, Air Quality, of the Draft EIR, on-site operational emissions would not exceed any of the LSTs. In addition, as shown in Table IV.B-9 of the Final EIR, combined construction and operational emissions would be well below the SCAQMD's LST thresholds. (Draft EIR, p. IV.B-37.)

A detailed carbon monoxide (CO) hot spot analysis is not needed if a project intersection does not exceed 400,000 vehicles per day. At buildout of the Project, the highest average daily trips at an intersection would be approximately 49,360 at the Arroyo Parkway and Glenarm Street intersection, which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003

Air Quality Management Plan (AQMP). This daily trip estimate is based on the peak-hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Arroyo Parkway and Glenarm Street intersection would exceed the 1-hour CO standard if modeled in detail based on the studies undertaken for the 2003 AQMP. Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant. (Draft EIR, pp. IV.B-37 and IV.B-38; see also Final EIR, Response to Comment Nos. 8-9 and 8-10.)

The primary sources of potential air toxics associated with Project operations include diesel particulate matter (DPM) from delivery trucks associated with the Project's restaurant and college uses (e.g., truck traffic on local streets and idling on adjacent streets). However, these activities and the land uses associated with the Project are not considered land uses that generate substantial TAC emissions. Based on SCAQMD guidance, the Project is not considered to be a substantial source of DPM warranting a refined HRA, since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, diesel-fueled commercial vehicles (delivery trucks) would not idle for more than 5 minutes at any given time in accordance with the California Air Resources board (CARB) requirements, which would further limit diesel particulate emissions. Furthermore, the quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program (CalARP). As such, the Project would not release substantial amounts of TACs, and impacts on human health would be less than significant. (Draft EIR, pp. IV.B-38 through IV.B-40.)

Based on the above, the Project would not violate an air quality standard or expose sensitive receptors to substantial pollutants. Also refer to the technical worksheets included in Appendix C of the Draft EIR for supporting calculations.

5. Consistency with the SCAQMD AQMP

Project development would not increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations. As a result, the Project would also not delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. In addition, the Project's long-term influence

would also be consistent with the goals and policies of the AQMP and would not exceed the assumptions used in the preparation of the AQMP. Therefore, the Project is considered consistent with the AQMP. (Draft EIR, pp. IV.B-41–IV.B-45; see also Final EIR, Response to Comment No. 3-3.)

6. Cumulative Impacts

a. Construction

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Construction-related daily emissions at the Project Site would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative construction-related regional emissions would not be cumulatively considerable and, therefore, would be less than significant. Construction of the Project also would have a less-than-significant impact with regard to localized emissions. Therefore, the Project's contribution to cumulative air quality impacts due to localized emissions would also not be cumulatively considerable and, therefore, would be less than significant. (Draft EIR, p. IV.B-46.)

As with the Project, construction activities with respect to each development project under the General Plan buildout would not result in a long-term (i.e., 70-year) substantial source of TAC emissions. In addition, the SCAQMD's *CEQA Air Quality Handbook* and supplemental online guidance/information do not require an HRA for short-term construction emissions or provide recommendations or guidance for such an analysis. In addition, it is not meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. As such, cumulative TAC emission impacts during construction would be less than significant. (Draft EIR, p. IV.B-47.)

b. Operation

According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then that project would also result in a cumulatively considerable net increase of these criteria pollutants. Operational emissions from the Project would not exceed any of the SCAQMD's regional or localized significance thresholds at Project buildout or under

the existing conditions analysis. Therefore, the emissions of non-attainment pollutants and precursors generated by Project operation would not be cumulatively considerable. (Draft EIR, p. IV.B-47.)

With respect to TAC emissions, neither the Project nor any of the development projects under the General Plan buildout (which primarily include residential, retail/ commercial, and other non-residential uses), would represent a substantial source of TAC emissions, which are more typically associated with large-scale industrial, manufacturing, and transportation hub facilities. However, the Project and each of the development projects under the General Plan buildout would likely generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs CARB to identify substances as TACs and adopt airborne toxic control measures (ATCMs) to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Air Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the Project would not result in any substantial sources of TACs that have been identified by CARB's Land Use Guidelines and, thus, would not result in a cumulatively considerable impact or a cumulatively significant impact. (Draft EIR, p. IV.B-47.)

Based on the above, the Project would not generate short-term or long-term emissions that would be a cumulatively considerable contribution to the non-attainment designations of the Air Basin.

C. Geology and Soils

1. Potential Impacts Evaluated

- Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

  - Rupture of a known earthquake fault, as delineated on the most recent Alquist–Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42);

  - Strong seismic ground shaking;

- Seismic-related ground failure, including liquefaction or
- Landslides? (Draft EIR, p. IV.E-29.)

- Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? (Draft EIR, p. IV.E-29.)

- Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? (Draft EIR, p. IV.E-29.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of Project would not result in significant impacts related to geology and soils. Impacts would be less than significant, and no mitigation measures are required.

4. Supporting Explanation

The analysis in Section IV.E, Geology and Soils, of the Draft EIR is based on the following technical reports included as Appendix F to the Draft EIR: the *Soils and Geology Report to Support the Environmental Impact Report—Proposed Art-Center College of Design Master Plan* (Geotechnical Report) prepared by Geotechnologies, Inc. (February 7, 2017), the *Fault Rupture Hazard Study, ArtCenter South Campus, Pasadena, California* (Fault Rupture Study) prepared by Shannon & Wilson, Inc. (August 3, 2017), and the *Review of Fault Rupture Hazard Study Report* prepared by Geotechnologies, Inc. (September 15, 2017.) (Draft EIR, p. IV.E-1.)

With regard to surface ground rupture, there are no known active or potentially active faults that underlie either one of the two campuses, and the potential for surface rupture beneath them is considered low. Therefore, the Project would not expose people

or structures to potential substantial adverse effects related to fault rupture. Impacts associated with surface rupture would be less than significant. (Draft EIR, p. IV.E-30.)

With regard to strong seismic ground-shaking, both the Hillside Campus and South Campus are located within the seismically active region of Southern California and would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. However, impacts related to strong seismic ground-shaking can be overcome through engineering design solutions that would reduce the substantial risk of exposing people or structures to loss or injury. Compliance with State and local code requirements will ensure that buildings are designed and constructed in a manner that would reduce the substantial risk of building collapse although buildings may sustain damage during a major earthquake. Specifically, as with other development projects in the Southern California region, the Project would be required to comply with the current seismic design provisions of the 2016 California Building Code (CBC) (i.e., Chapter 16-16A, Structural Design; Chapter 17, Special Inspections and Tests; Chapter 18-18A, Soil and Foundations, etc.) to minimize seismic impacts. The 2016 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide for the latest in earthquake safety. In addition, Project construction would be required to apply accepted and proven construction engineering practices as well as adhere to seismic safety requirements and receive approval of compliance from the City of Pasadena Building and Safety Division before permits are provided. Therefore, the Project would not expose people or structures to potential substantial adverse effects related to strong seismic ground shaking. Accordingly, impacts related to strong seismic ground shaking would be less than significant. (Draft EIR, p. IV.E-31.)

With regard to liquefaction, the Project Site's Hillside and South Campuses are not located within Liquefaction Hazard Zones. Accordingly, no impacts related to liquefaction would occur. (Draft EIR, p. IV.E-31.)

With regard to landslides at the Hillside Campus, no landslides have been mapped in the vicinity of the Hillside Campus due to the relatively vast and continuous features of the underlying granite rocks. In addition, the Project does not propose new construction within and beyond the Hillside Campus other than the reconstruction and expansion of the South Building. As such, the Project at the Hillside Campus would not change the susceptibility of existing conditions related to seismically induced landslides and would

not expose people or structures to potential substantial adverse effects related to landslides. The Project's South Campus and its immediate vicinity are not characterized by changes in elevation. As such, the probability of seismically induced landslides would be low. Accordingly, no impacts related to landslides would occur. (Draft EIR, p. IV.E-32.)

Neither campus is located within a zone of known seismically induced settlement or subsidence from oil or fluid withdrawal. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or is planned at the Hillside Campus or South Campus. As such, the Project would not result in on- or off-site lateral spreading or subsidence, result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. (Draft EIR, p. IV.E-32.)

With regard to expansive soils, the soils found at the Hillside Campus and South Campus have been investigated and are characterized by a very low to moderate range of expansion. However, compliance with the California Building Code (i.e., Chapter 18-18A, Structural Design; Chapter 17, Special Inspections and Tests; Chapter 18-18A, Soils and Foundation) would reduce the potential effects of moderately expansive soils to less than significant levels. (Draft EIR, p. IV.E-33.)

In summary, based on the analyses within the Draft EIR and the technical reports included in Appendix F to the Draft EIR, the following determinations were made:

The Project would introduce new structures, residents, and employees into an area located in the seismically active Southern California region and could be subjected to the potential effects related to seismic events, including surface ground rupture, moderate to strong ground-shaking, liquefaction, or landslides. However, compliance with regulatory requirements would reduce potential impacts to less than significant levels. (Draft EIR, p. IV.E-32.)

The Project would not be located on unstable soils that could potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. (Draft EIR, p. IV.E-32.)

The Project may be located on expansive soils that could potentially create substantial risks to life or property. Compliance with regulatory requirements would reduce potential impacts to less than significant levels. (Draft EIR, p. IV.E-33.)

5. Cumulative Impacts

Each development project under the General Plan buildout would be subject to established guidelines and regulations pertaining to building design and seismic safety, including those set forth in the CBC, the City's routine building and construction permitting process (includes a review of compliance with building and site design standards related to seismic and geologic safety) and as overseen by the City's Building and Safety Division. In addition, the Safety Element ensures that the City implements policies to reduce the City's risks and hazards and maximize the community's emergency preparedness through established programs. Therefore, with adherence to applicable regulations, Project impacts with regard to geology and soils would not be cumulatively considerable, and cumulative impacts would be less than significant. (Draft EIR, p. IV.E-33.)

D. Greenhouse Gas Emissions

1. Potential Impacts Evaluated

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Draft EIR, p. IV.F-38.)

- Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? (Draft EIR, p. IV.F-38.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the Project would not result in significant impacts related to the

greenhouse gas emissions. Impacts would be less than significant, and no mitigation measures are required.

4. Supporting Explanation

With regard to generation of greenhouse gas emissions, the SCAQMD identified a screening criterion of 3,000 metric tons CO_2e ($MTCO_2e$) per year for commercial/ residential projects to determine whether a land use project could presumptively have less-than-significant greenhouse gas (GHG) impacts if it produced less GHG emissions than the screening criteria. As shown in Table IV.F-6, the Project would result in 9,866 $MTCO_2e$ per year for combined construction and operational GHG emissions. When the existing emissions associated with the current operation of ArtCenter of 7,303 $MTCO_2e$ per year are taken into account, as shown in Table IV.F-6, the resulting net Project emissions would be 2,563 $MTCO_2e$ per year. Therefore, the Project would produce less GHG emissions (i.e., 3,000 $MTCO_2e$ per year screening criterion compared to 2,563 $MTCO_2e$ per year net total Project GHG emissions) than the draft SCAQMD screening criterion, and impacts would be less than significant. (Draft EIR, p. IV.F-46.)

With regard to consistency with plans and policies, the detailed regulatory compliance analysis provided in Section IV.F, Greenhouse Gas Emissions, of the Draft EIR demonstrates that the Project complies with or exceeds the regulations and GHG reduction actions/strategies outlined in CARB's *Climate Change Scoping Plan*, Southern California Association of Governments (SCAG)'s 2016–2040 RTP/SCS, City's Green City Action Plan, and City's General Plan Mobility Element policies. (Draft EIR, p. IV.F-47.)

More than 95 percent of the Project's GHG emissions are due to energy use, mobile sources, and water-related source categories. The numerous regulatory programs that ensure energy efficiency of buildings and the increasing decarbonization of power production would reduce the Project's energy related emissions. The numerous regulatory programs that improve the fuel efficiency of vehicles would help reduce the Project's mobile related emissions. The numerous water efficiency measures would help reduce the Project's water-related emissions. In addition, all of these emission source categories are covered by the California Cap-and-Trade program. As discussed in detail in Section IV.F, Greenhouse Gas Emissions, of the Draft EIR, the Cap-and-Trade Program has been designed to provide a firm cap, ensuring that the 2020 Statewide emission limit would not be exceeded. Thus, for the emission sources covered by the Cap-and-Trade Program, which are nearly all of the sources associated with land use

development projects, compliance with 2020 goals is assured by the Cap-and-Trade Program. (Draft EIR, p. IV.F-70.)

The Project is also consistent with the approach outlined in CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. (Draft EIR, p. IV.F-71.)

As part of SCAG's 2016–2040 RTP/SCS, a reduction in VMT within the region is a key component to achieving the 2020 and 2035 GHG emission reduction targets established by CARB. As shown in Appendix C of the Draft EIR, the Project results in a VMT reduction of approximately 33 percent in comparison to a standard project as estimated by CalEEMod and in GHG emissions from mobile sources and would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS and would be consistent with the 2016–2040 RTP/SCS. (Draft EIR, p. IV.F-71; see also Final EIR, Response to Comment No. 1-4.)

The Project also would comply with the City of Pasadena's Green City Action Plan, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's compliance with regulatory measures and project design features provided above and throughout the Draft EIR would advance these objectives. (Draft EIR, p. IV.F-71; see also Final EIR, Response to Comment Nos. 1-3 and 1-4.)

Overall, given the Project's consistency with State, SCAG, and City of Pasadena GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts related to GHG emissions are less than significant. (Draft EIR, p. IV.F-72.)

5. Cumulative Impacts

As discussed on pages IV.F-72 and IV.F-73 of the Draft EIR, although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased

accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to State or global GHG emissions and, consequently, it would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing Statewide emissions to 1990 levels by 2020, even though Statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce Statewide GHG emissions. However, currently there are no applicable adopted CARB or SCAQMD significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining impact significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represents new emissions or existing, displaced emissions. Nonetheless, the Project would be consistent with State, SCAG, and City of Pasadena GHG emission reduction goals and objectives, and the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given the Project's consistency with State, County, and City GHG reduction goals and objectives, the contribution to the cumulative impact of global climate change would be less than significant. (Draft EIR, p. IV.F-72.)

E. Land Use

1. Potential Impacts Evaluated

- Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (Draft EIR, p. IV.I-14.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant, and no mitigation measures are required.

4. Supporting Explanation

As discussed on pages IV.I-15 through IV.I-20 of the Draft EIR the Project would be consistent with the requirements and policies of the Pasadena General Plan Land Use Element, the Central District Specific Plan, the South Fair Oaks Specific Plan, the Pasadena Municipal Code, and regional plans.

a. Pasadena General Plan Land Use Element

i. Hillside Campus

The proposed improvements within the Hillside Campus would be limited to the demolition of the Annex Building, the enclosure of the Sinclaire Pavilion, the installation of photovoltaic canopies at the North and South Lots, the expansion of the South Building to create a new Commuter Services and Facilities Hub, and improvements to circulation and parking. These improvements would not result in substantial changes to the uses at the Hillside Campus that would noticeably change the scale and character of the Hillside Campus or the surrounding residential neighborhoods in the San Rafael Hills. Accordingly, these improvements would be consistent with the citywide goals and policies of the Pasadena General Plan Land Use Element that are applicable to the Project, including those related to sustainable growth, viewsheds, land use compatibility, and natural open space. More specifically, as it relates to the protection of natural open space, the Project would be required to comply with State laws and City regulatory requirements, as well as to implement several mitigation measures for the protection of sensitive biological resources. (Draft EIR, pp. IV.I-15 and IV.I-16.)

ii. South Campus

Specifically within the South Campus, the proposed improvements under the Master Plan would be consistent with the City's vision to increase density in areas

immediately adjacent to transit stations (i.e., Metro Gold Line Fillmore Station). The Project would increase density in underutilized areas (i.e., surface parking lots) and locate new ArtCenter facilities, including student housing, in close proximity to the Metro Gold Line Fillmore Station. The proposed buildings on the South Campus would be consistent and compatible with the planned expansion of the Huntington Memorial Hospital to the northwest of the South Campus and the existing independent and assisted living facility (i.e., The Fair Oaks) to the west of the South Campus on Fair Oaks Avenue. (Draft EIR, p. IV.I-16.)

Buildout of the proposed buildings on the South Campus would increase the height, density, and massing of on-site structures, as compared to existing conditions. However, the change in scale would be moderated by a high degree of articulation created by fenestration; variations in building planes and façade setbacks and projections; and a variety of surface materials. These would be the requirements of the design standards and guidelines established in the South Fair Oaks Specific Plan for the proposed 988 and 888 Buildings along Raymond Avenue and the design standards and guidelines established in the Central District Specific Plan for the proposed 1101 Building along Arroyo Parkway to reduce the visual effect of the height and massing from public vantage points and provide a pedestrian scale adjacent to the public streets. (Draft EIR, p. IV.I-16.)

As related to the promotion of a sustainable environment, the Project would provide short- and long-term bicycle parking spaces for students, employees, and visitors, in addition to bicycle-serving amenities, as well as increase pedestrian accessibility, to encourage biking and walking and support healthy lifestyles. Furthermore, the Project design would increase pedestrian accessibility, which would further encourage walkability. The Project would also incorporate measures to reduce air quality and GHG emissions. The proposed improvements would utilize existing infrastructure (e.g., water lines, sewer system, electrical and natural gas lines) already established in the vicinity of the Hillside Campus and South Campus to make efficient use of land, energy, and infrastructure. (Draft EIR, pp. IV.I-16–IV.I-17.)

As related to the enhancement of the urban landscape, the Project would create different-scaled open spaces to support a variety of uses to enhance the public and private realms. These open spaces would occur throughout the South Campus and would be fully integrated into the campus rather than residual spaces that would be filled in after construction of the new buildings. The primary open spaces that would be provided with the Project include the elevated Main Quad that would feature pedestrian paths, planted areas,

seating areas, dining areas, and assembly areas in the southwestern portion of the South Campus; and the North Quad, which would comprise the podium level of the 888 Buildings and would feature a diversity of outdoor spaces for social interaction and relaxation, study tables, fitness areas, community gardens, dining terraces, lounging decks, and table games. A portion of the North Quad would be accessible to the community and may evolve into an outdoor sculpture garden or a community garden. (Draft EIR, p. IV.I-17.)

The proposed improvements would primarily serve ArtCenter students and faculty members. Accordingly, the student housing units created by the Project would not provide traditional housing opportunities for the South Fair Oaks Specific Plan and Central District Specific Plan areas, but would alleviate housing demand created by ArtCenter students who temporarily relocate to the area to be closer to school. (Draft EIR, p. IV.I-17.)

b. Central District Specific Plan

The eastern portion of the South Campus between Arroyo Parkway and the Metro Gold Line right-of-way is located within the Central District Specific Plan area. Section 3 of the Central District Specific Plan includes planning objectives related to new development in the Central District Specific Plan area. Recognizing that the Central District lies at the heart of the City, the planning objectives in Section 3 encourage focused growth in the Central District that follows urban land patterns (e.g., transit-oriented, pedestrian-oriented, and mixed-use). Objectives are included to promote quality of life, including objectives related to safe and attractive communities, suitable housing, an effective range of accessible services, and access to public transit. With its proximity to transit, expansive network of pedestrian-friendly spaces and linkages, mixed-use nature, and quality and variety of architecture and design (which would be ensured through the incorporation of the Central District Specific Plan Design Guidelines in the City's Design Review process), the proposed improvements within the South Campus would be consistent with the type of development envisioned for the Central District. (Draft EIR, pp. IV.I-17–IV.I-18.)

As related to the objectives of the Central District Specific Plan that are relevant to the potential environmental effects of the Project, the Project would enhance environmental quality by contributing to the development of the Project area's urban forest by planting trees in the landscaped plazas, quads, and gardens and complying with plan and design standards provided in PMC Chapter 8.52 (City Trees and Tree Protection

Ordinance) and Pasadena Zoning Code Section 17.44 for landscaping. In addition, the Project would reduce auto dependency and promote transit usage to minimize traffic impacts. The Project's general consistency with the applicable planning objectives of the Central District Specific Plan is presented in Table 2 in Appendix I of the Draft EIR. (Draft EIR, p. IV.I-18.)

c. South Fair Oaks Specific Plan

The western portion of the South Campus between Raymond Avenue and the Metro Gold Line right-of-way is located within the South Fair Oaks Specific Plan area. Accordingly, the following discussion addresses the South Campus only. The primary objectives of the South Fair Oaks Specific Plan that are applicable to the proposed improvements within the South Campus relate to the integration of land use and transportation programs near a light rail station and the mitigation of traffic impacts in the South Fair Oaks Specific Plan area. The Project would be consistent with these objectives as the proposed improvements under the Master Plan would increase density in an area immediately adjacent to a light rail station. As related to the objective of the South Fair Oaks Specific Plan that is relevant to the mitigation of the traffic impacts of the Project, the South Campus would locate student housing and expand ArtCenter facilities within 300 feet of the Metro Gold Line Fillmore Station. With the provision of student housing within the South Campus to enable ArtCenter students to live on campus, the Project would increase non-auto travel (i.e., reduce traffic impacts) and encourage walking, bicycling, and the use of public transit to mitigate traffic impacts in the South Fair Oaks community. (Draft EIR, p. IV.I-18.)

d. Pasadena Municipal Code

No change to the current zoning is requested for the Hillside Campus. The western portion of the South Campus along Raymond Avenue is currently zoned as IG-SP-2-HL-56, while the eastern portion along Arroyo Parkway is currently zoned CD-6. As part of the Project's required entitlements, the portions of the South Campus currently zoned IG-SP-2-HL-56 and CD-6 would be rezoned to PS (Public, Semi-Public) pursuant to Section 17.26.020 of the PMC. The PS zoning district is consistent with and implements the Institutional land use designation of the General Plan; both the Hillside Campus and South Campus are designated as Institutional in the Pasadena General Plan. However, standards related to maximum development square footage, maximum height, maximum residential density, and permitted uses must be consistent with the Central District Specific Plan and South Fair Oaks Specific Plan. The development standards of the

Central District Specific Plan and the South Fair Oaks Specific Plan are codified in Chapters 17.30 and 17.35, respectively, of the Zoning Code. (Draft EIR, p. IV.I-19.)

The Project involves changing the zoning of the South Campus to the PS zoning district, in which the development standards, such as building height and setbacks, are specified by a Conditional Use Permit (CUP) or Master Plan. The Project is subject to the City's design review process, which would ensure that the Project would support the best of the City's architectural traditions and encourage new structures to show creativity and imagination, add distinction, interest, and variety to the community, and are environmentally sustainable. (Draft EIR, p. IV.I-19.)

e. 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy, Compass Growth Vision, and Regional Comprehensive Plan

As an urban infill development located within a designated High Quality Transit Area (HQTA), the proposed improvements within the South Campus would be consistent with the applicable goals set forth in each of these regional plans. Specifically within the South Campus, the proposed improvements under the Master Plan would increase density in an area immediately adjacent to a transit station (i.e., Metro Gold Line Fillmore Station). The Project would increase density in underutilized areas (i.e., surface parking lots) and locate new ArtCenter facilities, including student housing, in close proximity to the Metro Gold Line. The Project would enable ArtCenter students to live on-campus and utilize the different transit options, including seven bus/transit lines and the Metro Gold Line, located within one block of the South Campus. The Project also would provide short- and long-term bicycle parking spaces for students, employees, and visitors, in addition to bicycle-serving amenities that would further encourage biking. Furthermore, the Project design would increase pedestrian accessibility, which would further encourage walkability to provide a variety of travel choices. The Project would also incorporate measures to reduce air and GHG emissions, while promoting and maximizing regional mobility, livability, prosperity, and sustainability to contribute to a healthier community and region, as a whole. (Draft EIR, pp. IV.I-19–IV.I-20.)

5. Cumulative Impacts

Development projects under the General Plan buildout generally consist of infill development and redevelopment of existing uses, including institutional (including medical), mixed-use, residential, commercial, office, hotel, and recreational uses. As with

the Project, each of the development projects under the General Plan buildout would be required to be consistent with relevant land use policies and regulations, including, but not limited to, those that: (1) promote a healthy community and social interaction by encouraging walking, biking, and transit use; (2) support development practices that sustain natural environmental resources and contribute to the reduction of GHG emissions; (3) ensure accessibility and provide a compatible transition to adjoining neighborhoods; and (4) create transit-oriented development, multimodal features, and pedestrian/bicycle facilities that encourage other alternatives to motor vehicles. Accordingly, such development projects would not be expected to fundamentally alter the existing land use relationships in their respective neighborhood/community but, rather, would concentrate development on particular underutilized sites and promote a synergy between existing and new uses and result in the overall connectivity of each neighborhood and community internally and to the City and the region. The Project's incremental effect on land use is not cumulatively considerable, and, therefore, cumulative land use impacts would be less than significant. (Draft EIR, pp. IV.I-20–IV.I-21.)

F. Fire Protection

1. Potential Impacts Evaluated

- Would the Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services? (Draft EIR, p. IV.K-9.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the Project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause

significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Impacts would be less than significant, and no mitigation measures would be required.

4. Supporting Explanation

As discussed on pages IV.K-10 through IV.K-15 of the Draft EIR, the Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not significantly inhibit Pasadena Fire Department (PFD) emergency response.

During construction, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials. In addition, a Construction Staging and Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature K-3, to ensure that adequate and safe access remains available within and near the Hillside Campus and South Campus during construction activities. Thus, Project construction would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not significantly inhibit emergency response.

Development of the Hillside Campus would include renovations and additions to existing buildings, additional parking, installation of photovoltaic solar cells and canopies over the existing surface parking stalls, and modifications to campus access. These improvements to the Hillside Campus would not substantially change existing uses or substantially increase student population at the Hillside Campus and, therefore, are not anticipated to increase the demand for PFD fire protection services. Development of the South Campus would include renovations to existing buildings, demolition of existing buildings and surface parking, construction of new buildings for student housing and student amenities, development of outdoor quad areas, and construction of a campus Cycleway and mobility hub. Because the Project would increase the residential service population and the amount and scale of structural development on the South Campus, the Project would increase the demand for PFD fire protection services at the South Campus. However, the Project would implement CBC and California Fire Code (CFC) requirements regarding Project components, including, but not limited to, structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building

sprinkler systems. Compliance with these requirements would be demonstrated as part of building plans that would be submitted to the City for review and approval prior to the issuance of a building permit in accordance with City regulations. In addition, as set forth in Project Design Feature K-2, automatic fire sprinkler systems would be installed in all new buildings. Compliance with applicable regulatory requirements that are enforced through the City's building permitting process would ensure that adequate fire prevention features would be provided; thus, it would reduce the demand on PFD facilities and equipment. Furthermore, according to the PFD, operation of the Project would not result in a need for new or expanded fire stations.[3] Therefore, impacts with regard to PFD facilities and equipment would be less than significant.

With regard to emergency access, the entrance to the Hillside Campus would be improved to facilitate a more efficient traffic, parking, and circulation plan for the Hillside Campus. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of either the Hillside Campus or the South Campus. As such, emergency access to the Hillside Campus and South Campus and surrounding uses would be maintained at all times, and the increase in traffic generated by the Project would not significantly impact emergency vehicle response to the Hillside Campus or South Campus and surrounding uses, including SR-110, which is a designated freeway disaster route.[4] Furthermore, according to the PFD, response times are dependent on resource service levels and allocations from the City's budgeting process, and response times are not considered an impact on the environment.[5] Therefore, Project-related traffic is not anticipated to impair the PFD from responding to emergencies at the either campus. Impacts with regard to response times and emergency access would be less than significant.

Fire flow to the Project would be required to meet PFD fire flow requirements. As determined by the PFD, the fire flow for the Project would be based on the provisions set

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[3] *Written correspondence from Bryan Frieders, Deputy Fire Chief/Fire Marshal, City of Pasadena Office of the Fire Marshal, to Ha Ly, AICP, City of Pasadena Planning Department, May 12, 2017. See Appendix K of the Draft EIR.*

[4] *County of Los Angeles Department of Public Works, Disaster Route Map, City of Pasadena, July 2008.*

[5] *Written correspondence from Bryan Frieders, Deputy Fire Chief/Fire Marshal, City of Pasadena Office of the Fire Marshal, to Ha Ly, AICP, City of Pasadena Planning Department, May 12, 2017. See Appendix K of the Draft EIR.*

forth in CFC, Appendix B, Table B105.1, which is based on the type of construction and total square footage developed. According to Table B105.1, fire flow requirements could range from 1,500 gallons per minute (gpm) to 8,000 gpm. A reduction in required fire flow of up to 75 percent, as approved by the PFD, is allowed when a building includes an approved automatic sprinkler system installed in accordance with Sections 903.3.1.1 or 903.3.1.2 of the CFC.

With regard to fire flow and hydrants, all of the fire hydrants in the vicinity of the Hillside Campus and South Campus have the capacity to provide the required fire flow with the required localized residual pressures; no new hydrants would be required to serve the Project. Therefore, impacts with regard to fire flow would be less than significant.

5. Cumulative Impacts

Each project under the General Plan buildout would be required to comply with regulatory requirements related to fire protection and be subject to the City of Pasadena's routine construction permitting process, which includes a review by PFD for compliance with building and site design standards related to fire life safety, as well as coordinating with Pasadena Water and Power (PWP) to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. As discussed in the General Plan EIR, policies and implementation measures of the General Plan are designed to ensure collaboration between PFD and other involved agencies to achieve the City's development goals in phases, working within the budget and infrastructure constraints of the City. In following this process, there would be sufficient revenue available for necessary service improvements to provide for adequate fire facilities, equipment, and personnel upon buildout of the General Plan Update.[6] Thus, the Project and each development project under the General Plan buildout would generate revenues to the City's general fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could potentially be applied toward the funding of fire protection and emergency services provided by PFD. As such, these revenues to the City's general fund would help offset the increase in demand for fire protection and emergency services as a result of the Project and buildout of the General Plan. Therefore, buildout of the

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[6] *City of Pasadena, Pasadena General Plan EIR, Environmental Analysis, Public Services, August 2015.*

Project and the General Plan would not result in the need for new or expanded fire protection facilities. (Draft EIR, pp. IV.K-16–IV.K-17.)

G. Water Supply and Infrastructure

1. Potential Impacts Evaluated

- Would the Project have a significant impact related to water supply facilities if there are not sufficient water supplies available to serve the project from existing entitlements and resources and new or expanded entitlements are needed? (Draft EIR, p. IV.M-1-27.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the Project would result in less-than-significant impacts related to water supply facilities, and no mitigation measures would be required.

4. Supporting Explanation

a. Construction

As discussed on pages IV.M.1-28 through IV.M.1-29 of the Draft EIR, Phase I and Phase II construction activities would result in a limited and temporary water demand and are not anticipated to have any adverse impact on water supply and infrastructure because the water use during construction would be less than the water demand during Project operation. PWP has sufficient water supplies in normal, single-dry, and multiple-dry year scenarios to meet expected demands through the year 2040. As such, there is sufficient water for both phases of Project construction, including the installation of any required water distribution infrastructure. In addition, construction impacts associated with the installation of on-site water facilities and off-site connections are expected to be confined to trenching and related construction activities which would be temporary in nature and limited in extent. Furthermore, any rerouting or upgrading of existing water lines would be completed in accordance with standard city procedures, which would preclude any interruptions in existing service. Therefore, Phase I and Phase II

construction impacts to the City's available water supply and infrastructure would be less than significant.

b. Operation

As discussed on pages IV.M.1-29 through IV.M.1-32 of the Draft EIR, adequate water supplies and infrastructure would be available to accommodate the Project. Development of the Project would result in an overall increase in water demand from the Project Site during operation. As shown in Table IV.M.1-9 on page IV.M.1-30 of the Draft EIR, the Project would have an increased water demand of up to 116 acre-feet per year (AFY). As shown in Table IV.M.1-10 on page IV.M.1-31 of the Draft EIR, the total net increase in development resulting from the Project for both residential units and commercial square footage falls below the development capacities anticipated in the General Plan. As determined in the water supply assessment (WSA) prepared for the Project, the total demand estimated in the 2015 Urban Water Management Plan (UWMP) for parcels within the Project Site is 186.3 AFY. Therefore, because the increased water demand generated by the Project is lower than the 2015 UWMP estimate for the Project Site, the development resulting from the Project has been deemed accounted for in the 2015 UWMP water demand projections. Thus, PWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. Therefore, Phase I and Phase II development would result in less-than-significant impacts to water supply.

With regard to infrastructure, water service to the Project Site would continue to be supplied by PWP for domestic and fire protection uses. While domestic water demand is typically the main contributor to operational water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and, therefore, are the primary means for analyzing infrastructure capacity. The fire flow tests performed by PWP show that static pressures from 152 to 170 pounds per square inch (psi) and flows from 4,444 to 6,615 gpm with residual pressures of 20 psi can be delivered to the Hillside Campus. For the South Campus, assuming Type IIA construction and fully sprinklered buildings, the maximum fire flow demand is 2,625 gpm with a residual pressure of 20 psi. The fire flow tests show that static pressures from 70 to 79 psi and flows from 2,845 to 7,985 gpm with residual pressure of 20 psi can be delivered to the South Campus. Thus, with compliance with PFD and PWP requirements, the Project's fire flow impacts to water infrastructure would be less than significant.

5. Cumulative Impacts

Under the provisions of Senate Bill 610, PWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The WSA for projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. Furthermore, through PWP's 2015 UWMP process, the City will meet all new demand for water due to projected population growth to the year of 2040, through a combination of water conservation and water recycling. These plans outline the creation of sustainable sources of water for the City of Pasadena to reduce dependence on imported supplies. PWP plans to achieve these goals by expanding its water conservation program. To increase recycled water use, PWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Thus, it is anticipated that PWP would be able to supply the water demands of the Project, as well as future growth associated with the buildout of the General Plan. Therefore, cumulative impacts would be less than significant. (Draft EIR, pp. IV.M.1-32–IV.M.1-33.)

H. Wastewater

1. Potential Impacts Evaluated

- Would the Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB)? (Draft EIR, p. IV.M.2-4.)

- Would the Project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects? (Draft EIR, p. IV.M.2-4.)

- Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Draft EIR, p. IV.M.2-4.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the Project would not exceed wastewater treatment requirements or capacities, or require the expansion of treatment facilities. Impacts would be less than significant, and no mitigation measures would be required.

4. Supporting Explanation

As set forth on pages IV.M.2-5 through IV.M.2-7 of the Draft EIR, potential impacts associated with wastewater treatment and infrastructure would be less than significant. The estimated overall wastewater generated by the Project at Master Plan buildout would be 191,679 gallons per day (gpd). The Project's net estimated daily sewer generation would be 120,522 gpd. This net increase from the Project would represent approximately 0.23 percent of the available process flow capacity for the combined water reclamation plants (WRPs) and would remain under the maximum combined available capacity of 52.5 million gpd at Whittier Narrows WRP, and Los Coyotes WRP (also see page II-4 of the Final EIR). This increase in wastewater flows would not exceed the treatment requirements of the Los Angeles RWQCB.

The proposed improvements at the Hillside Campus would reduce sewer generation at this location due to reallocation of program space. At the South Campus, based on the breakdown of estimated sewer flows tributary to each sewer main, the Project would only account for approximately 0.95 percent of the 24-inch sewer main along Raymond and approximately 10.42 percent of the sewer main along Arroyo Parkway. Therefore, existing wastewater conveyance facilities would have sufficient capacities to accommodate the wastewater flow generated by Project buildout.

5. Cumulative Impacts

The City of Pasadena manages its sewer infrastructure through the Sewer Master Plan. The Sewer Master Plan is prepared by the City's Department of Public Works and forecasts sewer flows based on buildout of City's General Plan. The sewer mains fronting the Hillside Campus and South Campus were not identified to have insufficient capacity based on the analysis performed for the Sewer Master Plan. In addition, all new development in the City is subject to sewer capacity considerations as a part of the City approval process.

As discussed above, the Project would result in an additional overall generation of wastewater flow. However, the buildout of the General Plan is estimated to generate approximately 23.1 million gpd of wastewater by the year 2035. As such, the Project's estimated net wastewater generation of 120,522 gpd would only account for approximately 0.52 percent of the cumulative growth. Thus, the Project's contribution to cumulative wastewater generation would not be considerable, and the Project would have a less-than-significant impact related to wastewater generation. (Draft EIR p. IV.M.2-8.)

I. Solid Waste

1. Potential Impacts Evaluated

- Would the Project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Draft EIR, p. IV.M.3-23.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that the Project would be served by a landfill with sufficient capacity to accommodate the Project. Impacts would be less than significant, and no mitigation measures are required.

4. Supporting Explanation

a. Construction

Implementation of the improvements proposed at the Hillside Campus and the South Campus would generate waste from building demolition and the use of new materials to build new student housing, expand ArtCenter's academic and administrative uses, and accommodate new amenities to primarily serve on-campus uses. Pursuant to the Construction and Demolition Waste Management Ordinance (PMC Chapter 8.62), as described above, much of this material would be reused or recycled, as feasible, and would not contribute to space in landfills used by the City. The Project would be required to reduce landfill waste by diverting a minimum of 75 percent of the construction and demolition debris, As shown in Table IV.M.3-5 on page IV.M.3-25 of the Draft EIR, based

on construction and demolition debris rates established by the United States Environmental Protection Agency (USEPA), the Project would result in approximately 6,411 tons of waste from demolition and approximately 1,062 tons from construction, providing a total of 7,501 tons of construction and demolition debris. Adhering to the 75-percent diversion rule, the Project would contribute 1,875 tons of debris to the County's unclassified (inert) landfill, Azusa Land Reclamation Landfill. This amount of construction and demolition debris would represent approximately 0.003 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 57.56 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a fraction of the remaining capacity at the unclassified landfill serving the County. Since the County's unclassified landfill generally does not face capacity shortages and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. Therefore, such impacts would be less than significant, and no mitigation measures are required. (Draft EIR, pp. IV.M.3-24–IV.M.3-25.)

b. Operation

As shown in Table IV.M.3- 6 on page IV.M.3-27 of the Draft EIR, operation of the Project would result in a net increase of approximately 638 tons of solid waste generated on both campuses combined per year (1.75 tons per day). Conservatively assuming a minimum diversion rate of approximately 50 percent, the net increase in solid waste disposal associated with the Project would be approximately 319 tons per year (0.87 tons per day). This net increase in solid waste disposal associated with the Project would represent an approximate 0.20-percent increase in the City's annual solid waste disposal quantity based on the 2015 disposal of approximately 163,488 tons. It was conservatively assumed that all of the solid waste generated by the Project would be disposed of at the Scholl Canyon Landfill. The Scholl Canyon Landfill has a remaining capacity of 3.53 million tons. Thus, the Project's annual solid waste generation would represent approximately 0.009 percent of the Scholl Canyon Landfill's remaining capacity as of December 31, 2015. In addition, the average daily disposal at Scholl Canyon landfill was 910 tons per day as of 2015. As a result, the 0.87 tons of solid waste per day that would be generated by the Project would represent 0.096 percent of the 2015 average daily intake for Scholl Canyon Landfill. Furthermore, this analysis does not account for the potential expansion of the Scholl Canyon Landfill. Thus, the Project would be served by a landfill with sufficient permitted capacity to accommodate the disposal of solid waste generated by the Project's operation.

Therefore, such impacts would be less significant, and no mitigation measures are required. (Draft EIR, pp. IV.M.3-26–IV.M.3-28.)

5. Cumulative Impacts

Construction of the Project, in conjunction with forecasted growth in the County through 2030 (inclusive of the development projects under the General Plan buildout), would generate construction and demolition waste. Given the requirements of Chapter 8.62 of the PMC, it is anticipated that all future cumulative development would also implement measures to divert construction and demolition waste from the unclassified landfill. Furthermore, based on the current average disposal rate of 846 tons per day (based on six operating days per week), the unclassified landfill would be exhausted in 218 years. As such, the landfill does not face significant capacity issues and would be expected to have sufficient capacity to accommodate cumulative solid waste disposal needs. Therefore, cumulative impacts with regard to solid waste disposal during Project construction would be less than significant.

Operation of the Project, in conjunction with forecasted growth in the County through 2030 would generate solid waste and an increase in the demand for disposal capacity at landfills. According to the County of Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report, the forecasted 2030 waste generation volume for the County is approximately 31.8 million tons. The estimated Project generation net increase of approximately 813 tons of waste per year would represent 0.0026 percent of the forecasted 31.8 million tons or 0.0008 percent of the 99.98-million-ton capacity. In addition, the City estimated that the buildout of the General Plan would result in a net increase of approximately 20,900 tons of solid waste. Solid waste facilities accepting the majority of municipal solid waste have sufficient landfill capacity. The Project's annual increase of 813 tons would only contribute approximately 3.89 percent of the 20,900 tons estimated from the General Plan buildout. Furthermore, other development projects in the City and County would be required to meet the federal, State, and local statutes and regulations related to solid waste. Thus, the cumulative impacts of the Project to the County's estimated cumulative waste stream would be less than significant. (Draft EIR, pp. IV.M.3-28–IV.M.3-29.)

J. Energy

1. Potential Impacts Evaluated

- Would the Project use non-renewable resources in a wasteful and inefficient manner; result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; conflict with adopted energy conservation plans; or violate State or federal energy standards? (Draft EIR, p. IV.M.4-15.)

2. Proposed Mitigation

None required.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the Project would not Project use non-renewable resources in a wasteful and inefficient manner; result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities; conflict with adopted energy conservation plans; or violate State or federal energy standards. Impacts would be less than significant, and no mitigation measures would be required.

4. Supporting Explanation

A detailed analysis of the potential energy impacts associated with the Project is provided on pages IV.M.4-15 through IV.M.4-23 of the Draft EIR.

a. Use of Non-Renewable Resources

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker

travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As shown in Table IV.M.4-1 on page IV.M.4-17 of the Draft EIR, a total of 15,453 kilowatt-hours (kWh) of electricity, 62,987 gallons of gasoline, and 242,057 gallons of diesel would be consumed during Project construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. Gasoline usage during Project construction would represent approximately 0.002 percent of the 2016 annual on-road gasoline-related energy consumption and 0.04 percent of the 2016 annual diesel fuel-related energy consumption in Los Angeles County. In addition, the Project would be required to reduce landfill waste by diverting a minimum of 75 percent of the construction and demolition debris. Thus, the Project would not use non-renewable resources in a wasteful and inefficient manner during construction.

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating, ventilating, and air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table IV.M.4-2 on page IV.M.4-19 of the Draft EIR, the Project's net new energy demand associated with operation would be approximately 2,126 megawatt-hours (MWh) of electricity per year, 8,334,650 cubic feet (cf) of natural gas per year, 233,656 gallons of gasoline per year, and 76,330 gallons of diesel fuel per year.

In addition to complying with California Green Building Standards Code (CALGreen) requirements to reduce electricity and natural gas use, the Project Applicant would also install PV solar cells and canopies over the existing surface parking stalls in the Hillside Campus. The Project would also not include the installation of natural gas fireplaces. In addition, the Project area is currently served by Pasadena Transit, Metro, and ArtCenter shuttles, which will continue to run between the Hillside Campus and the South Campus. Furthermore, the Project would provide short- and long-term bicycle parking spaces, in addition to bicycle-serving amenities, that would further encourage biking. Additionally, the Project design would increase pedestrian accessibility, which would further encourage walkability. Overall, operation of the Project would not cause the use of non-renewable resources in a wasteful and inefficient manner. Impacts

associated with energy use would be less than significant, and no mitigation measures would be required.

b. Infrastructure Capacity

During construction, ArtCenter would be required to coordinate electrical infrastructure removals or relocations with PWP and comply with site-specific requirements set forth by PWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within PWP easements are minimized. In addition, the estimated construction electricity usage represents approximately 0.73 percent of the estimated net operational demand, which would be within the supply and infrastructure service capabilities of PWP. With regard to natural gas, the Project would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. If the Project requires the removal or relocation of underground gas lines, then, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for electricity or natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Construction-related impacts to electricity and natural gas supply and infrastructure would be less than significant.

Based on the Project's estimated electrical consumption of 2,126 MWh per year, the Project would account for approximately 0.16 percent of the 2030 electricity demand forecasted in PWP's planning area. As the proposed uses are consistent with the land use and zoning designations within the Project Site and given the low percentage of total demand the Project represents, the demand forecasts are anticipated to account for Project development. In addition, PWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area. With regard to natural gas, the Project would account for approximately 0.001 percent of the 2032 forecasted consumption in SoCalGas' service area. In addition, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area. Thus, operation of the Project would not result in an increase in demand for electricity or natural

gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Operational impacts to electricity and natural gas supply and infrastructure would be less than significant.

c. Compliance with Energy Plans and Standards

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 CALGreen Code and California's Building Energy Efficiency Standards, and the City of Pasadena Green Building Standards. Furthermore, the Project would be consistent with regional planning strategies that address energy conservation. In particular, the Project would be consistent with the energy efficiency policies emphasized in SCAG's 2016–2040 RTP/SCS. Most notably, the Project includes the development and expansion of the existing ArtCenter and addition of student housing on campus, which would reduce the number of vehicle trips necessary for students to make under existing conditions, as they would be able to access the campus by walking and utilizing shuttle services. The Project Site is also well-served by existing public transportation, including Pasadena Transit, Metro and ArtCenter shuttles, which will continue to run between the Hillside Campus and the South Campus. This is evidenced by the Project Site's location within a designated HQTA. The introduction of new job opportunities within a HQTA, as proposed by the Project, is consistent with numerous policies in the 2016–2040 RTP/SCS related to locating new jobs and housing near transit. All of these features would serve to reduce the consumption of electricity, natural gas, and petroleum-based fuel associated with VMT. Overall, the Project would not conflict with adopted energy conservation plans or violate State or federal energy standards. Impacts associated with regulatory consistency would be less than significant.

5. Cumulative Impacts

a. Electricity

Buildout of the Project, development projects under the General Plan buildout, and additional growth forecasted to occur in the City within PWP's service area would increase electricity consumption during Project construction and operation and, thus, cumulatively increase the need for energy supplies and infrastructure capacity, such as new or expanded energy facilities. PWP estimates that electricity consumption within PWP's

planning area will be approximately 1,320 gigawatt-hours (GWh) by 2030 (the latest available forecast year). Based on the Project's estimated electrical consumption of 2,126 MWh per year, the Project would account for approximately 0.16 percent of the 2030 demand forecasted in PWP's planning area. Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with growth expectations for PWP's service area. Accordingly, the Project's cumulative impacts related to electricity consumption would be less than significant. Furthermore, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by PWP are ongoing. As described in PWP's Integrated Resource Plan (IRP), PWP would continue to expand delivery capacity as needed to meet demand increases within its service area. The IRP takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the PWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. As such, cumulative impacts with respect to electricity infrastructure would be less than significant. (Draft EIR, pp. IV.M.4-23–IV.M.4-24.)

b. Natural Gas

Based on the 2016 California Gas Report, it is estimated that the natural gas consumption within SoCalGas' service area would be approximately 2.38 billion cf/day in 2032 (the Project's buildout year). The Project would account for approximately 0.001 percent of the 2032 forecasted consumption in SoCalGas' service area. SoCalGas' forecasts take into account projected population growth and development based on local and regional plans. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas' service area. Furthermore, future development projects would be expected

to incorporate energy conservation features, comply with applicable regulations, including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's cumulative impacts related to natural gas consumption would be less than significant.

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SoCalGas occur, as needed. It is expected that SoCalGas would continue to expand delivery capacity, if necessary, to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, the Project's cumulative impacts with respect to natural gas infrastructure would be less than significant. (Draft EIR, pp. IV.M.4-24–IV.M.4-25.)

c. Transportation Energy

At buildout, the Project's estimated petroleum-based fuel usage would be approximately 233,656 gallons of gasoline and 76,330 gallons of diesel per year, or a total of 309,986 gallons of petroleum-based fuels annually. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.006 percent of the 2016 annual on-road gasoline-related energy consumption and 0.011 of the diesel-related energy consumption in Los Angeles County, as shown in Appendix O of the Draft EIR. Additionally, as with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions. Furthermore, the Project would reduce the number of vehicle trips necessary for students to make under existing conditions, as they would be able to access the campus by walking and utilizing shuttle services. The Project Site is also well-served by existing public transportation, including Pasadena Transit, Metro, and ArtCenter shuttles. As discussed in Section IV.F, Greenhouse Gas Emissions, of the Draft EIR, the Project results in a VMT reduction of approximately 33 percent, which would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS. Overall, the Project's contribution to cumulative transportation energy use is not cumulatively considerable and is, therefore, less than significant. (Draft EIR, pp. IV.M.4-25–IV.M.4-26.)

IV. RESOLUTION REGARDING POTENTIAL IMPACTS THAT WOULD BE REDUCED TO LESS THAN SIGNIFICANT LEVELS WITH INCORPORATION OF MITIGATION MEASURES

A. Biological Resources

1. Potential Impacts Evaluated

- Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Draft EIR, p. IV.C-17.)

- Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service? (Draft EIR, p. IV.C-17.)

- Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Draft EIR, p. IV.C-17.)

- Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Draft EIR, p. IV.C-18.)

- Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Draft EIR, p. IV.C-18.)

2. Proposed Mitigation

To mitigate impacts on special status plant and wildlife species and other wildlife species, the following measures shall be implemented:

Mitigation Measure C-1: A qualified biologist shall complete pre-construction surveys within construction areas on the Hillside Campus prior to construction to determine the presence or absence of special status plant species within the construction area. If any special status plant species are identified, they shall be protected from impacts associated with construction activities to the maximum extent feasible. Protective measures shall include flagging and fencing of known plant locations and avoidance, where possible. No construction-related activities shall be allowed within areas fenced for avoidance, and construction personnel shall be briefed about the presence of the plants and the need to avoid effects on the populations. However, if avoidance is not possible, a mitigation plan shall be developed for relocation and establishment of plants at new protected locations in the biological study area (BSA). The mitigation plan shall also include provisions for follow-up monitoring that comply with regulatory agency requirements for success for a period of no less than two years to determine mitigation success and remedial measures should the initial efforts to mitigate fail. A report would be submitted to the City Planning & Community Development Department documenting the survey methods and results, including number and location of individuals observed, if any, and estimated population sizes.

Mitigation Measure C-2: Best management practices, such as silt fencing, fiber rolls, straw bales, or other measures shall be implemented during construction to minimize dust, dirt, and construction debris from leaving the construction area.

Mitigation Measure C-3: All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be stabilized using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover, or vegetative ground cover to minimize dust emissions.

Mitigation Measure C-4: A qualified biologist shall complete pre-construction surveys no more than 48 hours prior to construction within previously undeveloped areas to determine the presence or absence of wildlife in the construction area. Surveys shall be repeated if construction

activities are suspended for five days or more. If sensitive wildlife species are identified within an active work area, the biologist shall collect and relocate such species to an appropriate location of similar habitat within the undisturbed portions of the ArtCenter property. A report would be submitted to the City Planning & Community Development Department documenting the survey methods and results, including number and location of individuals observed, if any, and estimated population sizes.

Mitigation Measure C-5: Construction within 300 feet of any potential coastal California gnatcatcher habitat shall be avoided during the typical nesting season for the coastal California gnatcatcher, which is February 15 through September 1, to the extent feasible. If construction within 300 feet of any coastal sage scrub habitat is scheduled to begin between February 15 and September 1, nesting surveys shall be completed no more than 48 hours prior to construction to determine if there are any nesting coastal California gnatcatchers within 300 feet of the construction area. Surveys shall be repeated if construction activities are suspended for four days or more. If gnatcatchers are found within 300 feet of the construction area, appropriate buffers (typically 300 feet) consisting of orange flagging/fencing or similar shall be installed and maintained until nesting activity has ended, as determined in coordination with the Project biologist and regulatory agencies and as appropriate. A report would be submitted to the City Planning & Community Development Department documenting the survey methods and results, including number and location of coastal California gnatcatcher observed.

Mitigation Measure C-6: Trimming and removal of vegetation and trees shall be minimized and performed outside of the bird nesting season (February 15 to September 15) to the extent feasible. If trimming or removal of vegetation and trees must be conducted during the nesting season, nesting bird surveys shall be completed by a qualified biologist no more than 48 hours prior to trimming or clearing activities to determine if nesting birds are within the affected vegetation. Nesting bird surveys shall be repeated if trimming or removal activities are suspended for four days or more. If nesting

birds are identified, trimming and removal of vegetation and trees shall be postponed or halted by the biologist until birds have fledged and/or the nest is no longer active. A report would be submitted to the City Planning & Community Development Department documenting the survey methods and results, including number and location of individuals observed.

Mitigation Measure C-7: Construction within 500 feet of trees and vegetation that may provide nesting habitat for birds and raptors shall be minimized and shall be conducted outside of nesting season to the maximum extent feasible. If construction within 500 feet of vegetation must be conducted during bird nesting season, nesting bird surveys shall be completed no more than 48 hours prior to construction to determine if nesting birds, raptors, or active nests are in or within 500 feet of the construction area. Surveys shall be repeated if construction activities are suspended for five days or more. In the event nesting birds or raptors are found within 500 feet of the construction area, appropriate buffers (typically up to 300 feet for songbirds and up to 500 feet for raptors) shall be installed to ensure that nesting birds and active nests are not harmed. Buffers shall include fencing or other barriers around the nests to prevent any access to these areas and shall remain in place until birds have fledged and/or the nest is no longer active. A report would be submitted to the City Planning & Community Development Department documenting the survey methods and results, including number and location of individuals observed.

Mitigation Measure C-8: At least two weeks prior to construction, surveys shall be conducted by a qualified bat biologist to identify potential bat-roosting cavities and assess the presence of bats. Surveys shall be conducted during the active season for bats (typically spring, summer, and fall) to obtain more conclusive results, during the maternity season (typically late spring and summer) if feasible.

During the non-breeding and active season (typically fall and early spring), any bats roosting in cavities in the construction area, either in trees or in structures, shall be safely evicted under the direction of a qualified bat biologist. Once it has been determined that all

roosting bats have been safely evicted from roosting cavities, exclusionary devices shall be installed and maintained to prevent bats from roosting in these cavities prior to and during construction.

Pre-construction bat surveys shall be conducted by a qualified bat biologist within seven days prior to removal of any potential roosting cavities within the BSA to confirm that exclusionary measures have been successful and there are no bats within the construction area. Any areas from which bats cannot be excluded shall be monitored prior to and during construction for signs of roosting bats and disturbance during roost removal, to ensure that bats are not harmed. If appropriate, non-invasive measures shall be implemented, under the direction of a qualified bat biologist, to discourage bats from returning to roosts that cannot be closed off.

A report would be submitted to the City Planning & Community Development Department documenting the survey methods and results, including number and location of bats observed, if any.

Mitigation Measure C-9: Surveys and exclusion measures are expected to prevent maternal colonies from becoming established in the BSA. In the event that a maternal colony of bats is found in the construction area, the CDFW shall be consulted, and no work shall be conducted within 100 feet of the roosting site until the maternal season is over or the bats have left the site, or as otherwise directed by the CDFW. The site shall be designated as a sensitive area and protected as such until the bats have left the site. No clearing and grubbing shall be authorized adjacent to the site. Combustion equipment, such as generators, pumps, and vehicles, shall not to be parked or operated under or adjacent to the roosting site. Construction personnel shall not enter into areas beneath the colony, especially during the evening exodus.

To mitigate impacts on sensitive natural communities and wetlands, the following measures shall be implemented:

Mitigation Measure C-10: Silt fencing shall be installed around the wetland area during construction to prevent construction debris and construction generated dust from entering the wetland.

Mitigation Measure C-11: If vegetation in the wetland area is disturbed, a revegetation plan shall be developed to the satisfaction of the City Planning & Community Development Department, in consultation with any applicable permitting resource agencies, to revegetate any impacted wetland habitat. The revegetation plan shall include a summary of impacted vegetation, a planting plan, mitigation ratios, and success criteria based on regulatory agency requirements (but no less than monitoring for two years to ensure successful revegetation). Impacted wetland habitat shall be replaced at a minimum ratio of 1:1 such that there would be no net loss of wetland acreage. Additional replacement habitat shall be provided if required by California Department of Fish and Wildlife and/or the Regional Water Quality Control Board through the permitting process.

3. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations in the form of mitigation measures have been required in, or incorporated into, the Project which avoid the significant environmental effect as identified in the Final EIR.

4. Supporting Explanation

Potential impacts associated with biological resources are discussed on pages IV.C-18 and IV.C-21 of the Draft EIR as well as within the *Biological Resources Assessment for the ArtCenter College of Design Master Plan* (BRA) prepared for the Project by GPA Consulting (March 2017) and included as Appendix D of the Draft EIR. Due to the urbanized nature of the South Campus, the analysis focuses on potential impacts within the Hillside Campus.

a. Special Status Plant and Wildlife Species.

There is potential for several special status plant and wildlife species to be located within the undeveloped hillsides within the BSA. Although not currently planned, pending final design of the Project, ground disturbance may occur within approximately 0.07 acre

south of the South Building between the paved parking lot and the dirt maintenance road within the *Quercus Agrifolia* and *Heteromeles Arbutifolia* Woodland Alliance, a non-special status natural community. If special status plant and wildlife species were in this area, they could be directly impacted if they were to be trampled or destroyed during construction. In addition, special status plant species could be indirectly impacted by dust as a result of construction activities conducted adjacent to the hillsides. Similarly, special status wildlife species could be indirectly impacted by noise, vibration, dust, and human activity. Construction activities could disturb wildlife to the extent that they may abandon their burrows or avoid foraging in areas near the construction area.

More specifically, there is disturbed chaparral habitat with small areas of California sagebrush and California buckwheat within the BSA, that could provide marginal habitat for the coastal California gnatcatcher. Therefore, there is a low potential for the federally threatened coastal California gnatcatcher to be within the BSA. This area is outside of the construction area and would not be directly impacted by the Project. However, noise, vibration, dust, and human activity could result in indirect impacts on the coastal California gnatcatcher if they were nesting within 300 feet of the construction area during construction. Construction activities could disturb nesting gnatcatchers to the extent that they abandon their nests or the eggs, or fledglings could fail to survive.

In addition, there are trees and vegetation within the BSA within which there is potential for migratory birds and raptors to nest. Tree removal could result in direct impacts on migratory birds if they were nesting in the trees to be removed. Similarly, noise, vibration, dust, and human activity could result in indirect impacts on migratory birds if they were nesting within 300 feet of the construction area during construction, or raptors nesting within 500 feet of construction. Construction activities could also disturb birds and raptors to the extent that they abandon their nests or the eggs, or fledglings could fail to survive. Moreover, there are trees and buildings within the BSA that could provide roosting habitat for some species of bats. Tree removal or building demolition (i.e., Annex Building) could result in direct impacts on bats if they were roosting in the trees or building to be removed. Noise and disturbance from adjacent construction activities could result in indirect impacts on bats, causing roost abandonment.

Mitigation Measures C-1 through C-3 would ensure impacts to special status plant species would be avoided during construction activities related to the expansion of the South Building by delineating their location if present and by minimizing dust and construction debris that could affect their productivity. Mitigation Measures C-4 through

C-7 would ensure impacts to special status wildlife species, the coastal California gnatcatcher, and other migratory birds and raptors would be avoided by prohibiting construction activities within 300 to 500 feet of nesting birds. Similarly, Mitigation Measures C-8 and C-9 would ensure impacts to bats would be avoided by safely evicting bats roosting in cavities during non-breeding and active season or prohibiting construction activities within 100 feet of roosting sites during maternal season. (Draft EIR, pp. IV.C-18–IV.C-19.)

b. Sensitive Natural Communities and Wetlands

One existing natural drainage was mapped as riverine near the South Building within the BSA. However, it was determined, upon further investigation, that this drainage would not be considered a federally protected wetland under jurisdiction of the U.S. Army Corps of Engineers (USACE). Accordingly, a Section 401 Water Quality Certification from the RWQCB and a Section 404 Nationwide Permit from the USACE would not be required for the Project. However, the drainage was considered waters of the State under jurisdiction of the CDFW and RWQCB. As discussed within Section IV.C. Biological Resources of the Draft EIR, the Biological Resources Assessment (BRA) included as Appendix D to the Draft EIR, and within the response to a May 5, 2018 letter from the CDFW that was received after preparation of the Final EIR (see attachment to staff report), the Project will comply with all relevant regulatory requirements regarding biological resources. In particular, ground disturbance within approximately 0.07 acres west of the South Building within the Hillside Campus located between a paved parking lot and a dirt maintenance road is proposed. Although not currently planned, pending final design of the Project, incidental encroachment into the CDFW jurisdictional area west of the South Building may occur. The jurisdictional area could also be indirectly impacted by dust, erosion, and water runoff caused by construction activities conducted adjacent to this area. These impacts would be considered potentially significant. If incidental encroachment into the jurisdictional area occurs as part of the project, a Section 1602 Streambed Alteration Agreement from the CDFW and waste discharge requirements (WDRs) from the RWQCB would be required prior to construction.

Mitigation Measures C-10 and C-11 would ensure that the wetland area near the South Building is protected from dust and construction debris and that any affected wetland habitat is replaced and restored. With implementation of this mitigation measure, potential impacts associated with wetlands would be reduced to less-than-significant levels. (Draft EIR, p. IV C-25.)

c. Interference with Wildlife Species or Established Migratory Wildlife Corridors

Improvements within the Hillside Campus would be limited to portions of the campus that are already developed. As discussed on page IV.C-16 of the Draft EIR and within Response to Comment No. 3 of the May 5, 2018 letter from CDFW received after the Final EIR was prepared (see attachment to staff report), the Biological Study Area (BSA) was delineated to encompass the direct Project impact area associated with the proposed improvements and a buffer to account for any potential for indirect impacts that could result from the Project. The BSA excluded areas of the Hillside Campus where no direct or indirect impacts on biological resources are expected to occur.

As discussed in Section IV.C, Biological Resources, of the Draft EIR and within the BRA included in Appendix D of the Draft EIR, immediately adjacent to the BSA are undeveloped hillsides, and deer were observed playing/foraging along the hillsides within the BSA. A complete list of wildlife species observed in the BSA is included in Attachment B and photographs of the BSA are provided in Attachment C of the BRA.

As discussed in the BRA, according to the CDFW BIOS Habitat Connectivity Viewer, the BSA is not within an essential connectivity area. The CDFW was contacted during preparation of the Final EIR to obtain specific mapping information to provide a more comprehensive description of the potential for wildlife movement within the Hillside Campus. However, copies of any formal mapping by the CDFW were not available. In a recent letter dated May 5, 2018, that was submitted after preparation of the Final EIR, CDFW indicated that the Hillside Campus areal is located in and contributes to a regional wildlife movement/live-in habitat corridor and linkage complex that includes the Verdugo Mountains/San Rafael Hills.

As discussed in the Draft EIR and within the responses to the May 5, 2018, CDFW letter, although the BSA is likely to be used for local wildlife movement of birds and small wildlife, it is likely that regional wildlife movement of larger mammals would remain along the perimeter of the developed campus and within the undeveloped hillsides where human activity is limited. In addition, the Project would not add buildings or structures within the Hillside Campus that would impede or reduce the ability for wildlife to move around the perimeter of the campus or through the undeveloped hillsides. Furthermore, the Project would comply with all relevant regulatory requirements and would implement Mitigation Measures C-1 through C-11 to ensure that any temporary construction-related

impacts to biological resources within the BSA would be less than significant. As such, given the already developed nature of the improvement areas and implementation of regulatory requirements and mitigation measures, improvements within the developed portions of the Hillside Campus proposed by the Project would not interfere with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

d. Compliance with The City's Tree Protection Ordinance

The Project would involve the removal of a total of 148 trees, including Aleppo pine (*Pinus halepensis*), American sycamore (*Platanus occidentalis*), Afghan pine (*Pinus eldarica*), Brisbane box (*Tristania conferta*), sweet gum (*Liquidambar*), and Canary Island pine (*Pinus canariensis*) from the North Lot (45 trees) and the South Lot (103 trees) to accommodate the installation of photovoltaic canopies and cells at these parking lots. One protected Aleppo pine (a Specimen tree) would be removed from the North Lot, and six other protected Aleppo pine trees would be retained. The Project would be required to comply with the City's Trees and Tree Protection Ordinance, which requires a Private Tree Removal Permit and replacement trees or payment of compensatory fees up to 50 percent of the required number of replacement trees. Per the ordinance, the number and species of replacement trees is based on the diameter at breast height (DBH) and the species of the removed trees. Replacement of the removed trees is required within a reasonable period of time (typically specified as within five years of removal of the protected tree).

The Project would implement protective construction techniques, including installation of protective chain-link fencing at the Root Protection Zone, limiting work conducted within the Root Protection Zone to hand tools, and minimizing trenching within the Root Protection Zone as part of the City's Tree Protection Ordinance, in accordance with the City's Tree Protection Guidelines. Therefore, impacts on protected trees would be less than significant. (Draft EIR, pp. IV.C-20–IV.C-21.)

5. Cumulative Impacts

The Project would contribute to cumulative impacts on biological resources if the Project and other development projects under the General Plan buildout were to adversely affect biological resources within the City, particularly in the San Rafael Hills as related to the Project. However, many of the development projects under the General Plan buildout would occur in developed, urban areas and are not expected to result in

any impacts on protected birds and bats, protected trees, or special status plant and wildlife species. As discussed above, there is some potential for the Project to affect special status plant and wildlife species and other wildlife species in the undeveloped hillside and encroach into sensitive natural communities and wetlands during construction. However, the Project's potential contribution (up to 0.07 acre) to this potential impact would not be cumulatively considerable with implementation of proposed mitigation measures, which require implementation of BMPs, appropriate field assessments, and exclusionary measures to avoid the disturbance of biological resources. As such, cumulative impacts related to biological resources would be less than significant. (Draft EIR, p. IV.C-21.)

B. Cultural and Tribal Cultural Resources

1. Potential Impacts Evaluated

- Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? (Draft EIR, p. IV.D-18.)

- Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? (Draft EIR, p. IV.D-18.)

- Would the Project disturb any human remains, including those interred outside of dedicated cemeteries? (Draft EIR, p. IV.D-18.)

- Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

  a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

  b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1,

the lead agency shall consider the significance of the resource to a California Native American tribe. (Draft EIR, p. IV.D-19.)

2. Proposed Mitigation

Mitigation Measure D-1: Prior to any excavation activities, a plan shall be prepared and adopted by the Project Applicant to include provisions for the adequate recovery of scientifically consequential information should any archaeological resources be discovered during construction of the Project. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if cultural resources are discovered during construction of the Project, all ground-disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the Project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies and provide a comprehensive final report, including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources.

Mitigation Measure D-2: During grading and excavation activities, a monitor meeting the satisfaction of the Gabrieleño Band of Mission Indians—Kizh Nation shall be allowed to be present on-site. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if Native American artifacts are found, all ground-disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the Project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies and provide a comprehensive final report, including site record to the City and the

South Central Coastal Information Center at California State University, Fullerton. No further ground disturbance shall occur in the area of the discovery until Planning Department approves the report. Subsequently, the find shall be turned over to the tribe. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources as determined by the monitor.

3. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations in the form of mitigation measures have been required in, or incorporated into, the Project which avoid the significant environmental effects related to archaeological and tribal cultural resources as identified in the Final EIR.. Impacts associated with historical resources would be less than significant, and no mitigation measures are required.

4. Supporting Explanation

The analysis of potential impacts to cultural and tribal cultural resources is provided on pages IV.D-18 through IV.D-23 of Section IV.D, Cultural and Tribal Cultural Resources, of the Draft EIR. The analysis of historical resources is based in part on the *ArtCenter College of Design Master Plan, Historical Resources Technical Report* (Historical Resources Report) prepared by GPA Consulting (November 2016) included as Appendix E of the Draft EIR.

a. Historical Resources

As there are no designated or eligible historical resources on the South Campus, the Project does not have the potential to impact historical resources within this portion of the Project Site. In addition, the Project does not have the potential to affect historical resources beyond the parcels comprising the campus due to the nature of the proposed work, which would not extend beyond the campus parcels. In addition, the South Campus is not located within a historic district or landmark district.

The Project has the potential to impact only one historical resource: the Ellwood Building on the Hillside Campus, which has been designated a Pasadena Historic Monument; the Hillside Campus is not located within a historic district or landmark district. The Project does not propose any exterior modifications to the Ellwood Building. Therefore, an analysis of the Project for conformance with the Secretary of the Interior's Standards is not required. Furthermore, the City of Pasadena has reviewed the Project and determined that the proposed work would not require a Certificate of Appropriateness.

As evaluated in detail in Section IV.D, Cultural and Tribal Cultural Resources, of the Draft EIR, the Ellwood Building would retain all aspects of integrity and would not be materially impaired through any work associated with the Project. In addition, although the Project would introduce PV cells canopies, a new visual element to the area, the PV cells would be completely separated from the historical resource, minimizing the potential for material impairment of the historical resource. Furthermore, there are no historical resources immediately adjacent to either the South Campus or Hillside Campus that would have the potential to be directly or indirectly impacted by the Project. Thus, the Project would have a less-than-significant impact on historical resources as defined by CEQA, and no mitigation is required or recommended. (Draft EIR, pp. IV.D-19–IV,D-22.)

b. Archaeological Resources and Human Remains

The ground surface at both campuses is completely obscured by structures or paving, which makes it impossible for identifying the presence of archaeological resources without conducting invasive ground investigations (e.g., borings, trenching, etc.). As a result, both the Hillside Campus and South Campus and their vicinity may be sensitive for pre-historic or historic cultural resources. In the event that an archaeological resource were to be discovered during construction of the Project, particularly during excavation for the subterranean parking for the 988 and 888 Buildings at the South Campus, then work in the area would cease, and deposits would be treated in accordance with federal and State regulatory requirements. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98, as amended.

Furthermore, Section 15126.4(b)(3)(C) of the CEQA Guidelines suggests as mitigation that prior to any excavation activities, a plan be prepared and adopted to include provisions for the adequate recovery of scientifically consequential information from and about a historical resource of an archaeological nature. These studies would be deposited with the California Historical Resources Regional Information Center. If an artifact must be removed during excavation or testing, then curation would be an appropriate response.

As established in the Pasadena General Plan, all ground-disturbing activities in the immediate area of a discovered cultural resource would be halted until the discovery has been evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria have been met, then the project would be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University, Fullerton. No further ground disturbance shall occur in the area of the discovery until Planning Department approves the report.

Implementation of Mitigation Measure D-1 specifying procedures for the unanticipated discovery of cultural resources during construction would ensure that impacts related to archaeological resources that may be found during construction of the Project would be reduced to less-than-significant levels. (Draft EIR, pp. IV.D-22–IV,D-23.)

c. Tribal Cultural Resources

In compliance with the requirements of AB 52, the City provided formal notification of the Project to the Kizh Gabrieleños. Andrew Salas, Chairman of the Kizh Gabrieleños, responded in a letter dated September 13, 2016, that the Kizh Gabrieleños have concerns since the Project lies within their ancestral territories and requested that a certified Native American Monitor be present at the Hillside Campus or South Campus during any and all ground-disturbing activities (including, but not limited to, pavement removal, pot-holing, auguring, boring grading, excavation, and trenching). Neither one of the campuses nor the surrounding areas have been surveyed for the presence of buried cultural resources. The ground surface at both campuses is completely obscured by structures or paving, which makes it impossible for identifying the presence of buried cultural resources without conducting invasive ground investigations (e.g., borings, trenching, etc.). As a result,

both the Hillside Campus and South Campus and their vicinity may be sensitive for pre-historic or historic cultural resources. However, due to the limited amount of ground disturbance anticipated within the Hillside Campus, the discovery of tribal cultural resources is not anticipated to occur. At the South Campus, excavation for the subterranean parking for the 988 and 888 Buildings may have the potential to uncover tribal cultural resources. Accordingly, Mitigation Measure D-2, which permits a Native American monitor to be present during these grading and excavation activities during construction, has been included. Thus, in the event that tribal cultural resources are found, such resources would be treated in accordance with federal and State regulatory requirements, and tribal cultural resources would be turned over to the tribe. With implementation of Mitigation Measure D-2, impacts would be reduced to less-than-significant levels. (Draft EIR, pp. IV.D-23–IV.D-24.)

5. Cumulative Impacts

As discussed above, there is only one historical resource located within the vicinity of the Project. The Ellwood Building, located within the Hillside Campus, would retain all aspects of integrity and would not be materially impaired through any work associated with the Project. In addition, there are no adjacent historical resources that would be impacted directly or indirectly by the Project. Thus, while past, present, and future cumulative development may have the potential to result in potential cumulative impacts to historical resources, the Project's contribution to potential significant impacts to historical resources would not be cumulatively considerable.

With regard to potential cumulative impacts related to archaeological resources, most of the development projects under the General Plan buildout are generally located within areas that have been disturbed and developed over time. In the event that archaeological resources are uncovered, each development project would be required to comply with applicable regulatory requirements and subject to applicable mitigation measures, such as that identified for the Project. Therefore, cumulative impacts to archaeological resources would be less than significant and would not be cumulatively considerable.

Similarly, any cumulative impacts to tribal cultural resources would be reduced by compliance with applicable regulatory requirements in the event of inadvertent discovery. In addition, each development project under the General Plan buildout would be required to comply with the consultation requirements of AB 52 to determine and mitigate any

potential impacts to tribal cultural resources. Therefore, cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable. (Draft EIR, p. IV.D-24.)

C. Hazards and Hazardous Materials

1. Potential Impacts Evaluated

- Would the Project create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials? (Draft EIR, p. IV.G-35.)

- Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Draft EIR, p. IV.G-35.)

- Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? (Draft EIR, p. IV.G-35.)

- Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would create a significant hazard to the public or the environment? (Draft EIR, p. IV.G-35.)

2. Proposed Mitigation

The following mitigation measure is included to ensure that potential impacts related to hazards and hazardous materials would be less than significant:

Mitigation Measure G-1: A Soil Management Plan shall be prepared and implemented by ArtCenter to establish the protocol for management of environmental conditions that may be encountered during construction, including soil contamination, as well as underground features, such as the potential underground storage tanks (USTs).

3. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations in the form of mitigation measures have been required in, or incorporated into, the Project which avoid the significant environmental effect related to hazards as identified in the Final EIR.

4. Supporting Explanation

Potential impacts associated with hazards are discussed on pages IV.G-36 through IV.G-42 of the Draft EIR.

a. Use and Disposal of Hazardous Materials

i. Construction Impacts—Hillside Campus

During construction, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions. In addition, applicable laws and regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. With regard to asbestos, based on the age of the buildings, asbestos or asbestos-containing materials (ACMs) may be present. Thus, in accordance with SCAQMD Rule 1403, ArtCenter would be required to conduct a comprehensive asbestos survey prior to demolition or building renovation/expansion. In the event that ACMs are found within areas proposed for demolition or renovation/ expansion, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations prior to building disturbance. Similarly, lead-based paint (LBP) may also be present based on the age of existing buildings. In the event that LBP is found within areas proposed for demolition or building renovation/expansion, suspect materials would be removed in accordance with procedural requirements and regulations, including those established by the Toxic Substances Control Act, 29 Code of Federal Regulations (CFR) Sections 1910 and 1926 *et seq.*, and Titles 8 and 17 of the California Code of Regulations (CCR), for the proper removal and disposal of LBP prior to disturbance activities. In addition, prior to demolition of the Annex Building, the pad-mounted transformer observed near the building would be removed and disposed of in accordance with applicable regulations (40 CFR Part 761). Compliance with regulatory requirements would ensure that potential hazards impacts during construction within the Hillside Campus would be less than significant. (Draft EIR, pp. IV.G-37–IV,G-39.)

ii. Construction Impacts—South Campus

The South Campus is in proximity (i.e., within 0.25 of a mile) to several sensitive uses, including single-family residences to the southwest, multi-family residences to the east, and Blair High School to the southeast. During construction, the potential for encountering two small USTs (50-gallon gasoline UST and 70-gallon crude oil UST depicted on the 1903 Sanborn Map) and impacted soils exists due to the lack of removal and closure documentation for these USTs at the 988 Parcel. If encountered during construction, this would create a potential hazard to the construction workers and the public and would be considered a significant impact related to the potential release of hazardous materials or emissions into the environment and would be considered a Recognized Environmental Condition (REC). Therefore, a mitigation measure has been identified, involving the preparation of a soil management plan (SMP), to ensure that potential impacts associated with the removal of potentially contaminated soils and hazardous wastes would be less than significant.

Project construction would occur in compliance with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials and the generation, handling, and disposal of hazardous waste. With regard to asbestos, in accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by the City of Pasadena Building and Safety Division. In the event that ACMs are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. LBP may also be present on the South Campus based on the age of existing buildings. In the event that LBP is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations, including those established by the Toxic Substances Control Act, 29 CFR Sections 1910 and 1926 *et seq.*, and Titles 8 and 17 of the CCR, for the proper removal and disposal of LBP prior to demolition activities. Compliance with all applicable federal, State, and local requirements would ensure that impacts associated with the use and disposal of hazardous materials, ACM, and LBP would be less than significant. (Draft EIR, pp. IV.G-39–IV,G-40.)

b. Operational Impacts

Operation of the Project would involve the continued use of hazardous materials by ArtCenter at both the Hillside Campus and South Campus and limited use of potentially

hazardous materials typical of those used in residential, commercial/restaurants, and office uses, including cleaning agents, paints, pesticides, and other materials used for landscaping. Furthermore, a central plant is proposed within a portion of the two-story podium below the housing levels of the 988 Building. The central plant would be fueled by a combination of electricity with some natural gas (e.g., for water heating) and would include chillers, pumps, boilers, and miscellaneous piping vessels. Other heating and cooling equipment would be located on the roof of the 988 Building and would include, but not be limited to, cooling towers, PV panels, and air handling units.

All potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. Any risks associated with these materials would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, as the Project would comply with applicable regulations and would not expose persons or schools to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, impacts associated with the use and storage of these hazardous substances during operation of the Project would be less than significant, and no mitigation measures are required.

With implementation of the Project, it is anticipated that hazardous waste–generating activities could incrementally increase, particularly at the South Campus, due to the introduction of new commercial and institutional uses and student housing. As is the case under existing conditions, activities involving the handling and disposal of hazardous wastes at both the Hillside Campus and South Campus would occur in compliance with all applicable federal, State, and local requirements concerning the handling and disposal of hazardous waste. Furthermore, hazardous wastes would continue to be properly stored and conveyed to licensed waste treatment, disposal, or recycling facilities. Therefore, with compliance with relevant regulations and requirements, operational activities would not expose people or schools to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard associated with hazardous waste in excess of regulatory standards. Thus, impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant, and no mitigation measures are required.

As no asbestos, ACMs, or LBP would be used during Project construction or operation, buildout of the Project would not expose persons to friable asbestos or LBP. As a result, Project operation would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Thus, no impact associated with asbestos, ACMs, and LBP would occur.

Similarly, the new electrical systems to be installed as part of the Project would not contain polychlorinated biphenyls (PCBs). Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs. As such, operation of the Project would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, no human exposure to PCBs would occur as a result of Project implementation. (Draft EIR, pp. IV.G-39–IV,G-42.)

c. List of Hazardous Materials Sites

According to the Phase I ESAs prepared for the Hillside Campus and the South Campus, both campus locations were identified on a number of lists of hazardous materials sites. However, as identified above, the Phase I ESA did not identify any potential concerns regarding hazardous materials or hazardous waste beyond those related to the development of the 988 Parcel. A data gap exists within regard to the West Lot USTs identified in the 1903 and 1910 Sanborn Maps. With this data gap, construction at the 988 Parcel has the potential to result in the release of hazardous materials or emissions into the environment in the event that USTs and associated impacted soils are encountered. However, a mitigation measure has been identified below to address this data gap and ensure that potential impacts associated with encountering contaminated soils and hazardous wastes would be less than significant. Therefore, the Project would not create a significant hazard to the public or the environment. (Draft EIR, p. IV.G-42.)

5. Cumulative Impacts

Development in accordance with the General Plan would result in infill development and intensification of land uses within the City. During construction, the Project and each development project under the General Plan buildout would involve the use of hazardous materials, such as fuels, lubricants, paints, solvents, and greases in construction equipment and coatings used in construction. However, the materials

anticipated to be used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short-term in nature.

Grading and excavation in infill areas may expose construction workers and the public to known or potentially unknown hazardous materials in the soil. However, as with the Project, contaminated areas would be required to be remediated prior to construction activities and implementation of such development project under the General Plan buildout. Additionally, any unknown contamination discovered during excavation would require halting of all construction activities and remediation. Remediation would prevent exposure of people and the environment to these hazards.

Development projects under the General Plan buildout may involve demolition of older buildings that contain ACMs, LBP, or PCBs, resulting in potential exposure to these hazardous materials of workers or persons living in the area. However, as with the Project, each development project under the General Plan buildout would be required to comply with applicable regulations pertaining to the abatement and protection from exposure to ACMs, LBP, and PCBs. Compliance with the existing regulations would ensure cumulative impacts related to hazardous materials and hazardous wastes during construction are less than significant.

With regard to operation, implementation of the Project, in combination with other development projects under the General Plan buildout, would have the potential to increase the risk for accidental releases of hazardous materials. Each of the development projects under the General Plan buildout would require evaluation for potential threats, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, and PCBs, to ensure public safety and minimize impacts to sensitive receptors in the Project vicinity and would be required to comply with all applicable local, State, and federal laws, rules and regulations. Because environmental safety issues related to hazardous materials are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Therefore, with adherence to such regulations, cumulative impacts with regard to hazards and hazardous materials during Project operation would be less than significant. (Draft EIR, pp. IV.G-42–IV,G-43.)

D. Hydrology and Water Quality

1. Potential Impacts Evaluated

- Would the Project violate any water quality standards or waste discharge requirements? (Draft EIR, p. IV.H-27.)

- Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? (Draft EIR, p. IV.H-27.)

- Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? (Draft EIR, p. IV.H-27.)

- Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? (Draft EIR, p. IV.H-27.)

- Would the Project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Draft EIR, p. IV.H-27.)

- Would the Project otherwise substantially degrade water quality? (Draft EIR, p. IV.H-27.)

- Would the Project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

2. Proposed Mitigation

The mitigation measure identified below is included to ensure that the potential impact related to mudflows is reduced to a less-than-significant level:

Mitigation Measure H-1: The expansion of the South Building, including the new Commuter Services and Facilities Hub, shall be designed to incorporate a small channel or detention basin to intercept or deflect debris and mudflows away from the building to the satisfaction of the City's Building and Safety Division.

3. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations in the form of mitigation measures have been required in, or incorporated into, the Project which avoid the significant environmental effect related to hydrology/water quality as identified in the Final EIR.

4. Supporting Explanation

The analysis of potential impacts associated with hydrology is provided on pages IV.H-28 through IV.H-38 of the Draft EIR and supported by the Water Resources Technical Report included as Appendix M to the Draft EIR.

a. Consistency with Water Quality Standards, Potential Creation of Polluted Runoff, and Potential Degradation of Surface Water and Groundwater Quality

i. Construction

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into surface water and groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into surface water and groundwater that could affect existing contaminants, expand the area or increase the level of soil and groundwater contamination, or cause a violation of regulatory water quality standards.

Construction projects disturbing greater than 1 acre of soil would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the Permit requirements, the Project would prepare and implement a site-specific Stormwater Pollution Prevention Plan

(SWPPP), which would adhere to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify BMPs and erosion control measures to be used during construction to reduce runoff and pollutant levels in runoff during construction. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Site to ensure that runoff does not impact off-site drainage facilities, receiving waters, and groundwater.

With the implementation of site-specific BMPs included as part of the erosion control component of the SWPPP, the Project would reduce, if not eliminate, the discharge of potential pollutants into stormwater runoff. In addition, the Project would be required to comply with City grading permit regulations which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not result in discharge that would cause: (1) pollution that would alter the quality of the water of the State (i.e., Los Angeles River) or groundwater to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State or groundwater by waste to a degree that creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of the Project would not result in discharges to the Los Angeles River or discharges that may affect groundwater beneath the construction sites that would cause regulatory standards to be violated. Therefore, temporary construction-related impacts on water quality would be less than significant. (Draft EIR, pp. IV.H-28–IV.H-30.)

ii. Operation

Development of new buildings and uses would slightly increase the use of hazardous materials on-site. Operational activities that could affect water quality include spills of hazardous materials. However, the Project would be required to comply with all applicable regulations regarding the handling of hazardous materials and disposal of hazardous wastes, which would prevent the Project from affecting or expanding any potential areas of contamination and increasing the level of contamination. In addition, the Project is not anticipated to result in releases or spills of contaminants that would reach a groundwater recharge area, spreading ground, or otherwise reach groundwater

through percolation, as the Project would not involve drilling to or through a clean or contaminated aquifer. Therefore, operation of the Project would result in a less-than-significant impact on water quality. (Draft EIR, p. IV.H-30.)

b. Depletion of Groundwater Supplies or Interference with Groundwater Recharge

i. Construction

Groundwater was not encountered at the Hillside Campus during previous explorations that were conducted to a maximum depth of 101 feet below grade. The Project would not require any excavation at the Hillside Campus. Construction activities on the South Campus would involve excavation for the Project's two levels of subterranean parking in each of the proposed new buildings, construction of the new buildings, and hardscape and landscape activities around the new buildings. Groundwater was not encountered during subsurface exploration up to a maximum depth of 80 feet below existing surface. As such, temporary dewatering is not expected during excavation for the subterranean parking levels. Overall, Project construction activities would not adversely impact the rate or direction of groundwater flow or groundwater recharge. Therefore, the Project would not deplete groundwater supplies or interfere with groundwater recharge during construction activities, and impacts related to groundwater would be less than significant. (Draft EIR, pp. IV.H-30–IV.H-31.)

ii. Operation

The potential for groundwater recharge is not expected to be impacted by the proposed improvements at the Hillside Campus as the percentage of impervious surfaces would remain relatively unchanged from existing conditions. The South Campus is primarily impervious under existing conditions. As such, currently, there is minimal potential for groundwater recharge. The South Campus would develop landscaping and open space in the form of elevated quads (i.e., Main Quad and North Quad) situated on podium levels. In addition to the South Campus' being underlain with existing soils that have limited capacity to absorb stormwater during intense rain events, the permeable surfaces created by the new landscaping and open space on podium levels would not allow infiltration to the soil substrate to contribute to groundwater recharge. As such, the groundwater recharge potential would remain minimal. Furthermore, the water demand generated by the Project would be lower than the 2015 estimate for the Project under the PWP UWMP. Accordingly, water use by the Project has been deemed accounted for in

the 2015 UWMP water demand projections and would not exceed the available supplies projected by the PWP to deplete groundwater supplies. Therefore, the Project would not deplete groundwater supplies or interfere with groundwater recharge during Project, and impacts related to groundwater would be less than significant. (Draft EIR, pp. IV.H-30–IV.H-31.)

c. Drainage Patterns and Surface Runoff

i. Construction

The Project would comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the drainage patterns at the Hillside Campus and South Campus in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, adherence to standard compliance measurements in construction activities would ensure that construction of the Project would not cause flooding, substantially increase or decrease the amount of surface water flow from the construction sites into a water body, or result in a permanent, adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology, including drainage patterns and the rate and amount of surface runoff, would be less than significant.

ii. Operation

The Project would maintain approximately the same percentage of impervious area as currently exists at the Hillside Campus. Under existing conditions the Hillside Campus is characterized by approximately 45 percent of impervious surface area. Following the implementation of the proposed improvements at the Hillside Campus, the Hillside Campus would be characterized by approximately 46 percent of impervious surface area. As such, according to the Water Resources Technical Report, there would not be an increase in the imperviousness of the Hillside Campus that would substantially increase runoff volumes into the existing storm drain system. Therefore, peak flow rates would not increase.

A comparison of peak flow rates for existing and Project operation conditions indicates a negligible increase in stormwater runoff. Consequently, the Project would not

cause flooding during the 50-year developed storm event or create runoff that would exceed the capacity of existing or planned drainage systems. In addition, the Project would not substantially reduce or increase the amount of surface water in a water body or result in a permanent adverse change to the movement of surface water. The Project also would not require construction of new stormwater drainage facilities or expansion of existing facilities. As such, operation of the Project at the Hillside Campus would result in a less-than-significant impact on surface water hydrology, including drainage patterns and the rate and amount of surface runoff.

Under existing conditions, the South Campus is characterized by approximately 92 percent of impervious surface area. Based on observations under existing conditions, the Project Site discharges stormwater without filtration. Following the development of the Project at the South Campus, the South Campus would be characterized by approximately 72 percent of impervious surface area. The South Campus would develop landscaping and open space in the form of quads (i.e., Main Quad and North Quad), which would reduce the overall impervious surfaces. In addition, the South Campus is underlain with existing soils that have limited capacity to absorb stormwater during intense rain events. As such, according to the Water Resources Technical Report, there would be no incremental increase in the imperviousness of the Project Site that would substantially increase runoff volumes into the existing storm drain system. Therefore, peak flow rates would not increase.

A comparison of peak flow rates for existing and Project operation conditions indicates no increase in stormwater runoff at the South Campus. Consequently, the Project would not cause flooding during the 50-year developed storm event or create runoff that would exceed the capacity of existing or planned drainage systems at the South Campus. In addition, the development of the South Campus would also not substantially reduce or increase the amount of surface water in a water body or result in a permanent adverse change to the movement of surface water. Development of the South Campus also would not require construction of new stormwater drainage facilities or expansion of existing facilities. Furthermore, as part of the Project's Low Impact Development (LID) measures, post-construction BMPs would outline stormwater treatment practices required to control pollutants associated with storm events up to the 85th percentile storm event pursuant to the City's Stormwater Program. The BMPs would control stormwater runoff and ensure that no increase in runoff would result from development of the South Campus. As a result, the Project would not impact existing storm drain infrastructure serving the Project Site, and runoff would generally continue to

follow the same discharge paths and drain to the same stormwater systems. As such, operation of the Project at the South Campus would result in a less-than-significant impact on surface water hydrology, including drainage patterns and the rate and amount of surface runoff. (Draft EIR, pp. IV.H-31–IV.H-35.)

d. Mudflows

The very northernmost portions of Pasadena, above Devil's Gate Reservoir and Eaton Wash Reservoir, are mapped as areas of possible debris flows. However, the Hillside Campus has not experienced mudflows. The proposed improvement that could experience potential mudflows is limited to the expansion of the existing South Building in the southwestern portion of the Hillside Campus. This area is adjacent to a heavily vegetated slope with natural ground cover that has been established to keep soil in place and minimize the occurrence of mudflows. However, during heavy rain events, erosion of sediments from the adjacent slope may result in mudflows that could potentially affect the structural integrity of the expanded South Building and new Commuter Services and Facilities Hub. Implementation of Mitigation Measure H-1 would reduce potential impacts associated with mudflows at the Hillside Campus to less-than-significant levels. (Draft EIR, pp. IV.H-35–IV.H-37.)

5. Cumulative Impacts

The Project, in conjunction with forecasted growth in the Los Angeles River Watershed, could cumulatively increase stormwater runoff flows. However, the Project would have no net increase in stormwater flows. In addition, similar to the Project, cumulative growth in the Los Angeles River Watershed (inclusive of development projects under the General Plan buildout): (1) would be required to implement BMPs such that post-development peak stormwater runoff discharge rates would not exceed the estimated pre-development rates; and (2) would be subject to NPDES requirements related to water quality. Furthermore, the City of Pasadena would review each future development project on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Additionally, with implementation of new development projects under the General Plan buildout, new BMPs for the treatment of stormwater runoff would be installed at each development project site, thus improving the surface water quality runoff from existing conditions. New development and redevelopment projects would also be subject to LID plan requirements. Therefore, the Project's incremental effect on potential cumulative impacts associated

with the Project on surface water hydrology and water quality would not be cumulatively considerable.

The Project, in conjunction with forecasted growth in the region above the Pasadena subarea, could cumulatively increase groundwater demand. However, as noted above, the Project would not have any impact to the groundwater level. Therefore, the Project's incremental effect would not have a cumulatively considerable contribution to a potentially significant cumulative impact on groundwater hydrology.

The Project would not have an adverse impact on groundwater quality. In addition, it is anticipated that, similar to the Project, other future development projects would also be subject to Los Angeles RWQCB requirements and implementation of measures to comply with total maximum daily loads in addition to requirements of 22 CCR, Division 4, Chapter 15 and the Safe Drinking Water Act (SDWA). Therefore, based on the fact that the Project would not have an adverse impact on groundwater quality, and through compliance with all applicable laws, rules and regulations, its incremental effect on cumulative impacts to groundwater quality would not be cumulatively considerable.

Regarding mudflows, none of the areas proposed for future development under the General Plan buildout are in areas subject to potential mudflows. In addition, the City of Pasadena requires new construction in hillside areas of the San Gabriel Mountains and San Rafael Hills to conduct hydrology studies to assess the impact of construction on down-gradient developed areas. The assessment of possible impacts on the County's storm drains and privately-owned debris basins is also required. If the analyses indicate a potential hazard, improvements are required, and fees to pay for the improvements may be assessed to the developers, as appropriate. Therefore, the Project's incremental effect in conjunction with any development project under the General Plan buildout would not be cumulatively considerable with respect to mudflows. (Draft EIR, pp. IV.H-37–IV.H-38.)

E. Noise and Vibration

1. Potential Impacts Evaluated

- Would the Project result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Draft EIR, p. IV.J-19.)

- Would the Project result in the exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels? (Draft EIR, p. IV.J-20.)

- Would the Project result in a substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project? (Draft EIR, p. IV.J-20.)

- Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (Draft EIR, p. IV.J-20.)

2. Proposed Mitigation

Construction of the Project would result in significant noise impacts during nighttime construction activities at the South Campus. In addition, Project-related on-site construction activities would have the potential to result in significant vibration impacts with respect to building damage at the building adjacent to the 1101 Building. Thus, the following mitigation measures are included to minimize construction-related noise and vibration impacts to a less-than-significant level:

Mitigation Measure J-1: During nighttime construction activities associated with construction work above and below the Metro Gold Line ROW, a temporary and impermeable sound barrier shall be erected at the following locations. Examples of temporary sound barriers include: a loaded-vinyl noise control blanket (minimum STC-25) or plywood:

a) Along the southern and western property lines of the 988 Parcel. The temporary sound barrier shall be a minimum of 6 feet high and designed to provide a minimum 5 dBA noise reduction at the residential use at southeastern corner of Alarcon Place and Glenarm Street (receptor R4).

b) Along the eastern property line of the 1111 Parcel (from the northern property line to the existing 1111 Building). The temporary sound barrier shall be a minimum of 18 feet high and designed to provide a minimum 15 dBA noise reduction at the

residential use along Marengo Avenue north of Glenarm Street (receptor R5).

c) Along the southern property line of the 1111 Parcel (between the Metro ROW and the existing 1111 Building). The temporary sound barrier shall be a minimum of 12 feet high and designed to provide a minimum 10 dBA noise reduction at the residential use at the southeastern corner of Marengo Avenue and Glenarm Street (receptor R6).

Mitigation Measure J-2: Materials delivery and haul trucks that would be needed for the construction of the Main Quad over the Metro ROW and the underground tunnel under the Metro ROW shall be scheduled to occur during daytime hours only.

Mitigation Measure J-3: Prior to the start of construction for the 1101 Building, the Applicant shall retain the services of a structural engineer or a qualified professional to visit the existing building structure on Arroyo Parkway adjacent to the South Campus (1101 Building) to inspect and document the apparent physical condition of the buildings' readily-visible features.

The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring system capable of documenting the construction-related ground vibration levels at the off-site building during site demolition and excavation for the 1101 Building, where heavy construction (e.g., large bulldozer and drill rig) would be operating within 12 feet of the building adjacent to the north. In the event that site access to the adjacent off-site building is not available for the vibration monitoring, vibration monitoring shall be conducted at a distance of 12 feet from the construction equipment (representative of the distance between the off-site building and the construction equipment). The vibration monitoring system shall include the following:

a) The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inch/second. Vibration data shall be stored on a one-second interval. The system shall

also be programmed for two preset velocity levels: a warning level of 0.2 inch/second (PPV) and a regulatory level of 0.3 inch/second (PPV) at the off-site building. The system shall also provide real-time alert when the vibration levels exceed the preset level.

b) In the event the warning level of 0.2 inch/second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide and implement feasible steps to reduce the vibration level, including, but not limited to, halting/staggering concurrent activities and utilizing lower vibratory techniques.

c) In the event the regulatory level 0.3 inch/second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the building and have the structural engineer or a qualified professional visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide and implement steps to reduce the vibration level. Construction activities may then restart.

d) In the event construction vibration damage occurs at adjacent buildings, such damage shall be repaired to the conditions prior to commencement of such construction activities.

3. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations in the form of mitigation measures have been required in, or incorporated into, the Project which avoid the significant environmental effects related to noise and vibration as identified in the Final EIR.

4. Supporting Explanation

Potential noise and vibration impacts associated with the Project are analyzed on pages IV.J-23 through IV.J-44 of the Draft EIR.

a. Construction Noise Impacts

i. On-Site Construction Noise

To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment operating simultaneously. Table IV.J-8 on page IV.J-26 of the Draft EIR provides the estimated construction noise levels at the off-site noise sensitive receptors due to construction activities at the Hillside Campus. The estimated noise levels represent the worst-case scenario in which all pieces of construction equipment were assumed to operate simultaneously and located at the construction area nearest to the affected receptors. These assumptions represent the worst-case noise scenario as construction activities would typically be spread out throughout the entire site further away from the affected receptors. As indicated in Table IV.J-8, the estimated construction noise levels at a distance of 100 feet would be below the 85 dBA significance threshold. In addition, the estimated construction noise levels at the off-site receptors would also be below the significance threshold. Therefore, noise impacts associated with the Project's on-site construction activities at the Hillside Campus would be less than significant.

Table IV.J-9 on page IV.J-27 of the Draft EIR provides the estimated construction noise levels at the off-site noise sensitive receptors associated with the South Campus construction activities during the daytime hours. As indicated therein, the estimated noise levels at a distance of 100 feet would be below the 85-dBA significance threshold. The construction-related noise levels during the daytime hours at all off-site receptor locations would also be below the significance threshold.

Within the South Campus, development of the Main Quad between the 1111/1101 Buildings and the 988 Building and the underground tunnel connecting the subterranean parking between these same buildings would involve construction activities over and under the Metro Gold Line ROW. To prevent disruption to Metro's service, construction of the Project elements in the Metro Gold Line ROW would most likely occur during the nighttime hours when the train is out of service. Nighttime construction would occur between the hours of 1:00 A.M. and 4:00 A.M., or as determined by the Metro's Gold Line operating schedule. The Noise Ordinance normally prohibits the use of specific construction equipment, as well as construction activities after 7:00 P.M. Monday through Friday, after 5:00 P.M. on Saturday, and anytime Sundays and holidays within 500 feet of

a residential district. However, the Noise Ordinance provides flexibility for construction activities that would not cause discomfort or annoyance for a reasonable person of noise sensitiveness residing in the area. The Noise Ordinance also provides exemptions, for certain construction activities that are in the best interests of the public and to protect the public health, safety and welfare.

Consistent with the City's noise limit for general noise sources, the significance threshold for nighttime construction associated within the Project components above and below the Metro Gold Line would be 5 dBA above the ambient noise levels. The late night/early morning ambient noise levels at the nearby noise sensitive uses (i.e., residential uses) were measured between the hours of 2:00 A.M. and 3:00 A.M. on August 17, 2017. Table IV.J-10 on page IV.J-29 of the Draft EIR provides the estimated nighttime construction noise levels at the off-site noise sensitive receptors in the vicinity of the South Campus. As indicated in therein, the estimated nighttime construction activities would exceed the 5-dBA significance threshold above the ambient levels at all nearby sensitive receptors by a range of 1.6 dBA at receptor R4 to 12.0 dBA at receptor R5. However, implementation of Mitigation Measure J-1 would reduce the potential noise impacts to a less-than-significant level. (Draft EIR, pp. IV.J-23–IV.J-28.)

ii. Off-Site Construction Noise

In addition to on-site construction noise sources, materials delivery, concrete mix, haul trucks, and construction worker vehicles would require access to the Project Site during the construction phase. The major noise sources associated with off-site construction trucks would be associated with haul and delivery trucks. For the Hillside Campus construction activities (both Phase I and Phase II), there would be up to five deliveries (10 trips) per day. The estimated noise from the delivery trucks along Lida Street (roadway leading to the Hillside Campus) would be approximately 58.6 dBA (L_{eq}), which would be consistent with the existing ambient noise level of 59.6 dBA (L_{eq}). Therefore, noise impacts related to off-site construction traffic associated with the Hillside Campus construction would be less than significant.

For the South Campus construction, the peak period of construction with the highest number of construction trucks would occur during the grading/excavation phase for the 888 Building. During this phase, there would be up to 60 construction trucks coming to and leaving the Project Site (equal to 120 total trips) per day. Based on an eight-hour period (typical workday) and a uniform distribution of trips, there would be 15

truck trips per hour. There would also be construction truck trips (up to 100 truck trips per day) during other construction phases of the Project, but such trips would be less than the 120 truck trips under the grading phase for the 888 Building. The estimated noise level from the Project-related construction trucks associated with the South Campus construction would be approximately 64.0 dBA (L_{eq}) along the Project's anticipated haul routes (i.e., Raymond Avenue and California Boulevard). The estimated off-site construction truck noise level would be consistent with the existing ambient noise level of 64.1 dBA (L_{eq}) as measured at Receptor R2 along Raymond Avenue and 61.3 dBA (L_{eq}) as measured at Receptor R7 along California Boulevard. The construction noise levels would be below the 5-dBA significance threshold. In accordance with Mitigation Measure J-2, below, materials delivery and haul trucks that would be needed for the construction of the Main Quad over the Metro ROW and the underground tunnel under the Metro ROW would occur during daytime hours only. Nighttime construction is anticipated to solely focus on those activities that would occur above and below the Metro ROW. Therefore, with implementation of Mitigation Measure J-2, noise impacts from off-site construction traffic would be less than significant. (Draft EIR, pp. IV.J-28–IV.J-30.)

b. Construction Vibration Impacts

As indicated in Table IV.J-11 on page IV.J-32 of the Draft EIR, vibration velocities from typical heavy construction equipment operations that would be used during construction of the Project would range from 0.003 to 0.210 PPV at 25 feet from the equipment. The estimated vibration velocity levels (from all construction equipment) would be well below the Project significance thresholds at all off-site building structures adjacent to the Hillside Campus and at all on-site buildings within the Hillside Campus, including the Ellwood Building. With the exception of the off-site industrial building on the west side of Arroyo Parkway (adjacent to the future 1101 Building), the estimated vibration levels at the other nearest off-site structures adjacent to the South Campus would also be less than significant. However, the potential vibration impact at the industrial building would only occur when heavy construction equipment operates within 12 feet of the industrial building.[7] Mitigation Measure J-3 would reduce this potential vibration impact during construction to a less-than-significant level.

[7] *The 12 feet distance is the calculated distance where heavy construction equipment (e.g., large bulldozer and caisson drilling) would diminish to below the 0.3 threshold.*

Table IV.J-12 on page IV.J-33 of the Draft EIR provides the estimated vibration levels relative to human annoyance due to construction equipment at the off-site sensitive uses in the vicinity of the South Campus and Hillside Campus. As indicated therein, the estimated ground-borne vibration levels from construction equipment would be below the significance threshold for human annoyance at all off-site sensitive receptor locations. Therefore, vibration impacts on human annoyance during the construction period would be less than significant.

Vibration levels associated with the nighttime construction activities would be similar to the daytime construction activities, which would be well below the significance threshold at the nearby residential receptors (i.e., R4, R5 and R6). Therefore, vibration impacts on human annoyance during the nighttime construction period would be less than significant. With respect to potential building damage, nighttime construction activities with earth moving equipment (i.e., a large bulldozer, caisson drilling or loaded trucks) within 12 feet of the off-site industrial building (adjacent to the future 1101 Building) would generate vibration levels, which could exceed the 0.3 PPV significance threshold. However, Mitigation Measure J-2 would reduce the potential vibration impact during nighttime construction to a less-than-significant level. (Draft EIR, pp. IV.J-30–IV.J-33.)

c. Operational Noise Impacts

i. Mechanical Equipment

Within the South Campus, a new central plant would be located at the ground level (below the Main Quad) and new rooftop mechanical equipment (e.g., HVAC condenser units) would be located at the roof level. Although operation of the rooftop mechanical equipment would generate noise, compliance with the City's Noise Ordinance would limit noise from these stationary sources from exceeding the ambient noise levels on the premises of other occupied properties by 5 dBA. Therefore, noise impacts from mechanical equipment would be less than significant. (Draft EIR, pp. IV.J-33–IV.J-34.)

ii. Parking Facilities

The removal of the Annex Building at the Hillside Campus would result in 25 additional parking spaces to the existing North Lot at the Hillside Campus, an increase from 181 to 206 parking spaces. However, installation of the PV canopies would reduce the overall parking supply by approximately 180 spaces at both the North and South Lots.

This reduction in parking spaces would not result in any increase in noise levels associated with parking facilities at the Hillside Campus. Parking for the South Campus would be provided within the new two-level subterranean parking structures under the new buildings (988 Building, 1101 Building, and 888 Building). Sources of noise within the parking areas would primarily include car movement (engine noise), doors opening, people talking, and intermittent car alarms. Since the subterranean parking levels would be fully enclosed on all sides, noise generated within the parking garage would be effectively shielded from the off-site sensitive receptors located in the vicinity of the Project Site. In addition, noise associated with the new subterranean parking structures would be less than the noise levels associated with the existing surface parking lot. Therefore, noise impacts associated with the Project parking facilities would be less than significant. (Draft EIR, pp. IV.J-34–IV.J-35.)

iii. Outdoor Areas and Special Events

The Project includes several outdoor spaces, including the Main Quad, which is an elevated outdoor space located at the southern portion of the South Campus, and the North Quad, which is located at the podium level of the 888 Building. The Main Quad would include pedestrian paths, seating areas, dining areas, and assembly areas, which could be used to host special events, such as movie nights and concerts in the park. The North Quad would provide a diversity of outdoor spaces, including study tables, fitness area, community gardens, dining terraces, lounge decks, and table games.

For the noise analysis, it was estimated that up to 1,228 people could occupy the North Quad and up to 2,473 people could gather at the Main Quad, based on the California Building Code's occupant load factor of 15 square feet per person for assembly areas. Based on conservative assumptions, use of these outdoor areas would generate noise levels of approximately 61.4 dBA. When including the existing daytime ambient noise level of 64.1 dBA, use of the outdoor areas would generate a noise level of 66.0 dBA at the property line. Thus, when compared with the existing daytime ambient noise level, the noise level increase associated with occupation of the outdoor areas would be approximately 1.9 dBA.

As part of the Project, an amplified sound system would be used for special events. As set forth in Project Design Feature J-4, the amplified sound system used in outdoor areas at the North Quad and Main Quad would be designed so as not to exceed the maximum noise levels of 80 dBA (L_{eq}) at a distance of 25 feet from the amplified sound

system. In addition, the amplified sound system for the movie screening and concerts would be limited to a maximum noise level of 90 dBA (L_{eq}) at a distance of 50 feet from the amplified sound system. Table IV.J-13 on page IV.J-37 of the Draft EIR presents the estimated noise levels from the outdoor areas at the off-site sensitive receptors. As indicated therein, the estimated noise levels at all of the off-site sensitive receptors would be below 5 dBA. As set forth by the Noise Ordinance, a noise level increase from certain regulated noise sources of 5 dBA over the existing ambient noise level at an adjacent property line is considered a violation of the Noise Ordinance. Notwithstanding, the Noise Ordinance states that the city manager is authorized to permit special events to generate noise levels up to the limits specified in the noise element of the City's General Plan. Based on the Noise Element, the upper limit for such events at the Project Site cannot exceed 80 CNEL, which is considered the conditionally acceptable noise limit for educational land uses. The noise levels associated with operation of the amplified sound systems together with occupation of the outdoor spaces would be approximately 78.5 dBA CNEL at the property line. Thus, these noise levels would be less than the 80 CNEL threshold for special events that are authorized by the City. As such, impacts would be less than significant. (Draft EIR, pp. IV.J-35–IV.J-36.)

iv. Loading and Trash Compactor

The Project would include new loading docks and trash collection areas at locations within the Project Site. Project Design Feature J-3 would be implemented as part of the Project to locate and construct new buildings with loading docks and trash collection areas designed to incorporate partial or full enclosure of the loading areas and trash collection areas to provide shielding from off-site noise sensitive receptors to the extent necessary to comply with the City's Noise Ordinance. With compliance with Project Design Feature J-3, noise levels related to typical loading and unloading activities and trash collection associated with the Project would be less than significant. (Draft EIR, p. IV.J-36.)

d. Off-Site Traffic (Mobile Sources)

The off-site traffic noise impacts are presented in Table IV.J-14 on page IV.J-38 of the Draft EIR. The calculated CNEL levels overestimate noise levels as they are calculated in front of the roadways and do not account for the presence of any physical sound barriers or intervening structures. As shown in the table, the Project would result in a maximum increase of 0.6 dBA in traffic-related noise levels along Raymond Avenue (between California Boulevard and Glenarm Street). The estimated noise increase due

to Project-related traffic would be well below the 3-dBA significance threshold. Therefore, off-site traffic noise impacts associated with the future plus Project conditions would be less than significant. In addition, off-site traffic noise impacts associated with existing plus Project traffic conditions would be less than significant. (Draft EIR, pp. IV.J-36–IV.J-41.)

e. Composite Noise Level Impacts from Project Operations

In addition to considering the potential noise impacts to neighboring noise-sensitive receptors from each specific off-site (i.e., traffic) and on-site noise source (i.e., mechanical equipment, parking facilities, outdoor areas, and loading dock and trash collection areas), an evaluation of the potential composite noise level increase (i.e., noise levels from all noise sources combined) at the analyzed sensitive receptor locations was also performed. The Hillside Campus would not generate any significant new noise sources, which would not result in any noise increase at the off-site noise sensitive receptors. The composite noise levels were calculated for the new noise sources associated with the South Campus. Table IV.J-16 on page IV.J-43 of the Draft EIR presents the estimated composite noise levels in terms of CNEL at the off-site sensitive receptors. As indicated in Table IV.J-16, the Project would result in an increase of 0.1 dBA (at Location R7) to 1.6 dBA (at Location R6) at the off-site receptors in the vicinity of the South Campus. The estimated increases in noise levels due to Project operation would be below the 5-dBA CNEL significance threshold (applicable to noise level remains within the normally acceptable land use category). Therefore, composite noise level impacts due to the Project operations would be less than significant. (Draft EIR, p. IV.J-40.)

f. Land Use Compatibility

Proposed improvements on the South Campus would introduce noise sensitive uses (i.e., student housing) to an ambient noise environment ranging from 60.2 dBA CNEL (measured at receptor R1) to 69.1 dBA CNEL (measured at receptor R3). According to the City of Pasadena Guidelines for Noise Compatible Land Use, the ambient noise level at the South Campus location is considered “normally acceptable” for residential and school development. In addition, the Project would be required to provide the necessary noise insulation features in the final building design to achieve an interior noise environment that does not exceed 45 dBA CNEL, in accordance with the requirements of Title 25 of the California Administrative Code. Therefore, noise impacts associated with land use compatibility and the future on-site residential uses (i.e., student housing) would be less than significant. (Draft EIR, pp. IV.J-40–IV.J-44.)

g. Exposure to Ground-Bourne Vibration During Project Operation

The South Campus is located adjacent to the existing Metro Gold Line. Based on the Federal Transit Administration (FTA) Screening Distances for Vibration Assessment, the critical distance for Category 2 Land Use (i.e., residential) is 150 feet from the right-of-way. The proposed student housing buildings at the South Campus would be approximately 15 feet from the Metro Gold Line. Per FTA's Generalized Ground Surface Vibration Curves, the ground-borne vibration at 15 feet from light rail vehicles (at 50 miles per hour [mph]) would be approximately 80 VdB at the exterior of the buildings without accounting for any design or structural elements, which would exceed the FTA vibration criteria of 72 VdB (applicable to frequency events [i.e., more than 70 vibration events per day]). However, the train vibration levels inside the building would be attenuated, due to coupling to building foundation loss. Based on FTA adjustment factors, the coupling to building foundation loss would result in a 10-VdB reduction for 3- to 4-story masonry buildings. The proposed student housing buildings (888 Building, 988 Building, and 1101 Building) would be 8 stories in height. Based on FTA data, the proposed buildings would provide a minimum 10 VdB attenuation (i.e., reduction) from the coupling to foundation loss. Therefore, the ground-borne vibration inside the future student housing buildings from the Metro Gold Line would be reduced to approximately 70 VdB, which would be below the FTA vibration criteria of 72 VdB for residential uses. (Draft EIR, p. IV.J-44.)

5. Cumulative Impacts

a. On-Site Construction Noise

Noise from construction of development projects is typically localized and has the potential to affect areas within 500 feet from the construction site. Based on distance and intervening development, cumulative construction noise impacts from known development projects is not expected. In addition, construction-related noise levels from related projects would be intermittent and temporary, and it is anticipated that, as with the Project, these related projects and other development projects under the General Plan buildout would comply with the construction equipment noise limits, the allowable construction hours, and other relevant provisions set forth in the PMC. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual development project and compliance with locally adopted and enforced noise ordinances. Therefore, there would not be potential cumulative noise impacts in the event of concurrent construction activities. (Draft EIR, pp. IV.J-44–IV.J-45.)

b. Off-Site Construction Noise

Off-site construction trucks would have a potential to result in cumulative impacts if the trucks for the Project and other development projects were to utilize the same truck routes (e.g., California Boulevard between Pasadena Avenue and Arroyo Parkway). However, upon City review of the status of these related projects, only Related Project Nos. 11 and 57 have the potential to generate off-site construction trips that would overlap with the Project. There are no identified related projects in the close vicinity of the Hillside Campus, which would generate additional truck traffic on Lida Street. Therefore, potential cumulative noise impacts from off-site construction traffic would be less than significant in the vicinity of the Hillside Campus. At the South Campus, the Project would utilize up to 60 construction trucks during the grading and excavation phase for the 888 Building. This would result in an average of 7.5 trucks per hour over an eight-hour period and would generate up to 15 truck trips during peak construction period (site grading) when accounting for trucks arriving at and departing from the South Campus. The Project and Related Project Nos. 11 and 57 may generate cumulative noise level increases associated with haul truck trips. However, the Project's noise contribution associated with the 7.5 trucks per hour would be less than significant and would not be cumulatively considerable. (Draft EIR, p. IV.J-46.)

c. On-Site Construction Vibration

Ground-borne vibration decreases rapidly with distance. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity of the construction site (i.e., within 50 feet). The nearest related project is approximately 810 feet from the South Campus. Therefore, due to the rapid attenuation characteristics of ground-borne vibration, there is no potential for a cumulative construction impact with respect to ground-borne vibration. (Draft EIR, p. IV.J-46.)

d. Off-Site Construction Vibration

Off-site construction activities would include use of haul, delivery and concrete trucks. Vibration levels generated by these activities would be similar to the existing trucks traveling on the roadways. In addition, vibration impacts are evaluated based on the maximum level generated by the individual truck. Therefore, there is no potential for cumulative construction impacts to occur with respect to off-site construction vibration. (Draft EIR, p. IV.J-46.)

e. Operational Impacts—On-Site Stationary Noise Sources

Due to provisions set forth in the PMC that limit stationary source noise from items, such as roof-top mechanical equipment and compressors, noise levels from these sources would be less than significant at the property line for each development project under the General Plan buildout. In addition, with implementation of regulatory requirements and the proposed project design features presented in this section, noise impacts associated with operations within the Project Site would be less than significant. Based on the distance of the related projects, as well as other development projects under the General Plan buildout, from the Project Site and the noise levels associated with the Project, cumulative stationary source noise impacts associated with operation of the Project and these development projects would be less than significant. (Draft EIR, p. IV.J-47.)

f. Operational Impacts—Off-Site Mobile Noise Sources

The Project and other related development in the area, as well as other development projects under the General Plan buildout would produce traffic volumes (off-site mobile sources) that would generate roadway noise. The calculated traffic noise levels under existing and future cumulative plus Project conditions are presented in Table IV.J-17 on page IV.J-48 of Section IV.J, Noise, of the Draft EIR. As shown therein, cumulative traffic volumes would result in a maximum increase of 1.0 dBA along Raymond Avenue (between California Boulevard and Glenarm Street). At all other analyzed roadway segments, the increase in cumulative traffic noise would be lower. Thus, the cumulative traffic noise increase would be below the 3-dBA significance threshold. Therefore, cumulative noise impacts due to off-site mobile noise sources associated with the Project and future growth would be less than significant. (Draft EIR, pp. IV.J-47–IV.J-50.)

F. Traffic

1. Potential Impacts Evaluated

- Would the Project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system,

including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (Draft EIR, p. IV.L-17.)

- Would the Project conflict with an applicable congestion management program including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? (Draft EIR, p. IV.L-17.)

- Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Draft EIR, p. IV.L-17.)

- Would the Project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? (Draft EIR, p. IV.L-17.)

2. Proposed Mitigation

The mitigation measure identified below is included to ensure that the potential impact related to the operation of the digital gallery on the eastern façade of the 1111 Building is reduced to a less-than-significant level:

Mitigation Measure L-1: In order to ensure the digital gallery does not create confusion with traffic signals at the intersection of Glenarm Street and SR-110/Arroyo Parkway, the digital gallery shall be located no less than 50 feet north from the southeastern corner of the building or the lowest extent of the digital gallery shall be no less than 25 feet above the ground. The digital gallery shall be further reviewed by the Pasadena Department of Transportation (DOT) and other relevant agencies.

3. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis on pages IV.L-19 through IV.L-29 of the Draft EIR determined that implementation of the Project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; conflict with an applicable congestion

management program; or conflict with adopted polices, plans or programs regarding public transit, bicycle or pedestrian facilities. However, changes or alterations in the form of mitigation measures have been required in, or incorporated into, the project which avoid the significant environmental effect related to traffic hazards as identified in the Final EIR.

4. Supporting Explanation

a. Consistency with Applicable Plan, Ordinance or Policy Regarding the Performance of the Circulation System

As demonstrated by the analysis within Section IV.L, Traffic, of the Draft EIR and the Traffic Study included as Appendix L of the Draft EIR, the Project would not exceed the thresholds identified for Vehicle Miles Traveled (VMT) per Capita and Vehicles Traveled (VT) per Capita. As shown in Table IV.L-5 on page IV.L-20 and in Table IV.L-6 of the Draft EIR, the travel demand forecasting (TDF) model calculation results show that the Project's incremental change in VMT per capita is 15.2 for Phase I, and 14.6 at Project buildout, respectively, which do not exceed the City's adopted threshold of significance of 22.6. Therefore, Project impacts to the existing Citywide VMT per capita would be less than significant. In addition, as shown in Table IV.L-5 on page IV.L-20 and Table IV.L-6 on page IV.L-23 of the Draft EIR, the TDF model calculation results show that the Project's incremental change in VT per capita is 2.5 for Phase 1 and 2.3 at Project buildout, respectively, which do not exceed the City's adopted threshold of 2.8. Therefore, Project impacts to the existing Citywide VT per capita would be less than significant. (Draft EIR, pp. IV.L-19–IV.L-24; also see Final EIR, Response to Comment No. 1-2 regarding implementation of SB 743 and Response to Comment No. 1-4 regarding TDM strategies.)

As shown in Table IV.L-5 on page IV.L-20 and Table IV.L-6 on page IV.L-23 of the Draft EIR, the Project would not reduce the service population's accessibility to bicycle facilities or transit facilities or reduce the pedestrian accessibility of the City. Thus, impacts associated with accessibility to bicycle facilities, transit facilities and pedestrian accessibility would be less than significant. (Draft EIR, pp. IV.L-19–IV.L-24; also see Final EIR, Response to Comment No 1-3 regarding implementation of measures to encourage walking, biking and transit use.)

b. Consistency Applicable Congestion Management Program

The arterial monitoring station locations in Pasadena include Arroyo Parkway at California Boulevard (Congestion Management Plan [CMP] ID 119), Pasadena Avenue/St. John Avenue at California Boulevard (CMP ID 120), and Rosemead Boulevard at Foothill Boulevard (CMP ID 121). As shown in Table IV.L-7 on page IV.L-25 of the Draft EIR, for both Phase I and Project buildout, impacts would be less than significant at the CMP arterial monitoring station locations.

The mainline freeway monitoring locations in Pasadena include SR-110 at Pasadena Avenue (CMP Station 1050), SR-134 west of San Rafael Avenue (CMP Station 1056), I-210 west of SR-134 and I-710 (CMP Station 1060), and I-210 at Rosemead Boulevard (CMP Station 1061). Based on the trip distribution assumed in the Traffic Study, the Project would not add 150 or more trips onto the mainline freeway monitoring locations during either the A.M. or P.M. weekday peak hours. Therefore, impacts would be less than significant, and no further CMP analysis of the mainline freeway monitoring locations is required.

As shown in Table IV.L-8 on page IV.L-26 of the Draft EIR, for Phase I, there would be an estimated increase in transit trip ridership of 1,905 daily transit trips, 192 A.M. peak-hour transit trips, and 171 P.M. peak-hour transit trips are estimated in Phase I. For Project buildout, there would be an estimate increase in transit trip ridership of 2,312 daily transit trips, 226 A.M. peak-hour transit trips, and 208 P.M. peak-hour transit trips are estimated at Project buildout. As presented in Table IV.L-9 on page IV.L-27 of the Draft EIR, the Project would have available 14 transit stops, the Metro Gold Line, seven bus lines nearby, and the Project's own shuttle service. Therefore, there would be adequate transit capacity to serve the Project. (Draft EIR, pp. IV.L-24–IV.L-26.)

c. Traffic Hazards Due to Design Features

The Project proposes reconstruction and expansion of the South Building at the Hillside Campus to house administrative and transportation-related services, such as offices and break rooms for shuttle drivers, and allow storage areas currently located in the Ellwood Building to be relocated to this facility and create additional space available in the Ellwood Building for academic and other administrative uses. With the development of the proposed Commuter Services and Facilities Hub, the South Building would serve as a shuttle service/drop-off/turn-around point. In addition, the Project includes changes to the circulation system, including campus parking and access. These

improvements at the Hillside Campus are not expected to pose any hazards due to a design feature or incompatible uses.

The Project also proposes a new mobility hub and a Cycleway at the South Campus to improve and facilitate vehicular and non-vehicular circulation. In addition, development at the South Campus would involve the construction of a temporary pedestrian bridge and a large quad area over the Metro Gold Line and an underground tunnel beneath the Metro Gold Line to facilitate both pedestrian and vehicular circulation throughout the South Campus. Construction of the temporary pedestrian bridge, the Main Quad, and the tunnel would be required to comply with Metro requirements and other applicable building standards and codes to ensure that these structures that facilitate Project circulation would not affect the operation of the Metro Gold Line. As a Responsible Agency, Metro will review the Project's structural designs, construction methods, and operational features and impose certain requirements, including, but not limited to, vertical clearance, setbacks, structural support, hours of construction, etc (Draft EIR p. IV.L-28; also see Final EIR, Response to Comment Nos. 4-4, and 4-6 through 4-12 regarding Metro and CPUC requirements related to proposed improvements in the vicinity of the Metro Gold Line.)

In accordance with the City's Transportation Impact Analysis (TIA) Guidelines, the changes proposed by the Project would be addressed in detail prior to the Project's approval and funded prior to construction. Therefore, the Project would not substantially increase hazards due to Project design configuration, and impacts would be less than significant.

However, the Project would also include a digital gallery that displays images representing a wide array of artwork and conceptual designs associated with ArtCenter on the façade of the 1111 Building. The proposed 8,000-square-foot digital gallery would display a combination of colors, still images, animations, and videos, with a change-rate of no less than six seconds. It would be located anywhere between the southeastern corner of the building and the northeastern corner of the building, potentially "wrapping" either corner. If the digital gallery were located at the southeastern corner of the building, at the Glenarm Street, SR-110/Arroyo Parkway intersection, it could potentially be located behind the traffic signals, thereby conflicting with PMC Section 12.15.050, as described above, creating confusion, which may lead to hazardous driving conditions. As such, Mitigation Measure L-1 would be implemented to ensure that impacts related to hazards due to a design feature would be less than significant. (Draft EIR, pp. IV.L-28–IV.L-29;

also refer to Final EIR, Response to Comment No. 1-5 regarding Caltrans' regulations related to the digital gallery.)

d. Conflict With Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities

The Project would incorporate project design features including a mobility hub, a Cycleway, and additional shuttles and would be designed to: (1) encourage walking, biking, and transit use; (2) ensure accessibility and provide a compatible transition to adjoining neighborhoods; and (3) create multimodal features and pedestrian/bicycle facilities that encourage other alternatives to motor vehicles. As a result, the Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Furthermore, the Project would not decrease the performance or safety of such facilities. Therefore, impacts related to alternative transportation modes would be less than significant. (Draft EIR, p. IV.L-29.)

5. Cumulative Impacts

Cumulative transportation impacts within the City were recently evaluated in the 2015 Pasadena General Plan EIR. In evaluating the potential cumulative transportation impacts associated with the Project, the City's transportation demand model was run assuming the addition of the Project. The results of the analysis found that the transportation characteristics for the 2035 cumulative with Project scenario would not exceed the significance thresholds, as shown in Table IV.L-10 on page IV.L-30 of the Draft EIR. As such, cumulative impacts associated with all transportation modes would be less than significant.

With regard to the CMP, the 2015 Pasadena General Plan EIR determined that the buildout of the General Plan in 2035 would result in significant and unavoidable impacts to two CMP freeway segments and one arterial intersection. The impacted CMP freeway segments are I-210, at post mile R23.55, west of SR-134/I-710 and I-210, at post mile R29.72, west of Rosemead Boulevard. The impacted CMP arterial intersection is Pasadena Avenue and California Boulevard (CMP ID #120) in the A.M. peak hour. The 2015 Pasadena General Plan Final EIR identified no feasible mitigation measures available to reduce impacts to CMP freeway segments and arterial intersections to below a level of significance; therefore, the City adopted a Statement of Overriding Consideration as part of the General Plan Update. As identified above the Project would not add 150 or more trips onto the mainline freeway monitoring locations during either the

A.M. or P.M. weekday peak hours. Therefore, the Project's contribution to the impacts of General Plan buildout on freeway mainline segments would not be cumulatively considerable.

At buildout, the Project would contribute 64 trips during the A.M. peak hour and 56 trips during the P.M. peak hour to the intersection of Pasadena Avenue and California Boulevard, only slightly above the CMP's threshold for study of 50 peak-hour trips. At buildout of the City's General Plan, this intersection is anticipated to operate at LOS F during the A.M. peak hour, with a volume-to-capacity (V/C) ratio of 1.011; and an LOS E during the P.M. peak hour, with a V/C ratio of 0.946. However, the Project would not increase the V/C ratio of the Pasadena Avenue/California Boulevard intersection by more than 2 percent. Therefore, the Project's contribution to the impacts of the General Plan buildout on CMP arterials would not be cumulatively considerable. (Draft EIR, pp. IV.L-29–IV.L-31.)

V. Resolution Regarding Alternatives

CEQA requires that an EIR describe and evaluate the comparative merits of a reasonable range of alternatives to a project, or to the location of a project, that: (1) would feasibly attain most of the project objectives but would avoid or substantially lessen any significant impacts of the project, and (2) may be feasibly accomplished in a successful manner within a reasonable period of time considering the economic, environmental, social and technological factors involved. An EIR does not need to address alternatives that are not feasible, and the consideration of alternatives is to be judged against a rule of reason.

The lead agency is required to identify the environmentally superior alternative, but is not required to choose the environmentally superior for approval over the proposed project if the alternative does not provide substantial advantages over the project (i.e., does not avoid or substantially reduce the significant impact(s) that would otherwise occur from the project), does not attain most of the project objectives, or is infeasible due to social, economic, technological or other considerations.

The EIR identified objectives for the Project as follows (see Draft EIR, p. III-13 and III-14):

- To develop state-of-the-art, modern physical spaces at both campuses, including new and existing facilities, to meet evolving educational demands;

- To support a broader and richer student experience by adding on-campus student housing at the South Campus to encourage 24/7 possibilities for greater social and personal interaction, and creative growth and to provide affordable on-campus housing opportunities for students;

- To provide flexible spaces that can easily adapt to multiple uses and accommodate a wide variety of collaborative practices to reflect ArtCenter's transdisciplinary approach to the learning process;

- To create a greater sense of connection between the Hillside Campus and South Campus to enhance the student, faculty, and staff experience and increase the utility of existing and proposed new development on the South Campus;

- To improve access and circulation operations at the Hillside Campus and shuttle routes that facilitate the shift in growth to the South Campus;

- To expand existing sustainable policies, programs, and facilities and lessen the dependence on vehicles;

- To encourage an enhanced campus community through flexible and innovative outdoor and indoor spaces;

- To create a pedestrian-oriented environment defined by a hierarchy of spaces and pathways;

- To establish an urban design framework for the Project Site that responds to on-site conditions and creates a positive interface with the surrounding community; and

- To provide safe pedestrian connections within the South Campus.

The alternatives analyzed in the EIR represent a reasonable range of alternatives based on the applicable provisions of the CEQA Guidelines.

A. Alternatives Considered But Rejected

The City Council finds that the following alternatives described in the Draft EIR on pages V-3 through V-5 have been rejected as infeasible due to 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:

- **No Student Housing Alternative:** A Master Plan without on-campus student housing was considered as an alternative. However, this alternative would not fulfill the primary Project objectives: (1) to support a broader and richer student experience by adding on-campus student housing at the South Campus to encourage 24/7 possibilities for greater social and personal interaction and creative growth to provide affordable on-campus housing opportunities for students; and (2) to expand existing sustainable policies, programs, and facilities and lessen the dependence on vehicles.

  In addition, this alternative would result in greater impacts related to air quality, greenhouse gas emissions, and traffic as this alternative would not locate on-campus housing and supportive uses near transit and within a high quality transit area, as identified in Section IV.F, Greenhouse Gas Emissions, of the Draft EIR. However, this alternative would result in the same impacts related to all the other environmental topics. Nonetheless, the inability of this alternative to meet the primary objectives of the Project, while resulting in greater impacts related to air quality, GHG emissions, and traffic, makes this alternative infeasible. Therefore, this alternative was rejected from further consideration.

- **Buildout in Accordance with Previous Master Plan:** As discussed in Section III, Project Description, of the Draft EIR, the City of Pasadena City Council approved a 10-year Master Plan in 2006, for the South Campus that focused on student housing uses. This Master Plan, which expired in 2016, encompassed two parcels at 950 and 988 South Raymond Avenue to allow for a new student housing facility with 152 units (228 beds), and three levels of underground parking. No student housing facility was constructed under this Master Plan, and, as such, there is currently no on-campus housing available. There was no maximum enrollment capacity specified as part of this Master Plan. In addition, in order for ArtCenter to accommodate student enrollment growth and implement improvements to existing academic facilities and

programs, ArtCenter acquired two adjacent parcels to expand the existing South Campus, for which a CUP was obtained in 2013 for the alteration and adaptive reuse of a two-story former postal service building at 870 South Raymond Avenue and a parking structure at 888 South Raymond Avenue. Similarly, in 2014, ArtCenter acquired another parcel at 1111 South Arroyo Parkway and has obtained building permits for minor tenant improvements to change a portion of building from office use to academic use. Because the 2006 Master Plan only encompassed a small portion of the current South Campus, buildout in accordance with the previous Master Plan would not meet the following basic Project objectives:

- To provide flexible spaces that can easily adapt to multiple uses and accommodate a wide variety of collaborative practices to reflect ArtCenter's transdisciplinary approach to the learning process;
- To encourage an enhanced campus community through flexible and innovative outdoor and indoor spaces;
- To create a pedestrian-oriented environment defined by a hierarchy of spaces and pathways; and
- To provide safe pedestrian connections within the South Campus.

Moreover, the improvements envisioned in this previous Master Plan, which were not implemented, have been considered and incorporated into the proposed Master Plan and the alternatives, particularly those pertaining to the South Campus.

- **Increased Hillside Campus Development Alternative:** A Master Plan that proposes increased development at the Hillside Campus was considered as an alternative. However, due to the location of the Hillside Campus in a primarily low-density residential area and being immediately surrounded by primarily undisturbed open space, this alternative would result in greater environmental impacts related to the following issues:
  - Aesthetics—additional development may result in a substantial change in the visual character of the campus from the surrounding hillside areas;

- Air Quality—additional development may affect adjacent sensitive receptors during Project construction and from increased activity on the Hillside Campus;

- Biological Resources—additional development could result in encroachment onto undisturbed open space areas;

- Historic Resources—additional development may result in potential impacts to the Ellwood Building; and

- Noise—additional development may affect adjacent sensitive receptors during Project construction and from increased activity on the Hillside Campus.

Thus, the inability of this alternative to reduce the impacts of the Project, while resulting in greater impacts in other environmental issue areas, makes this alternative infeasible. Therefore, this alternative was rejected from further consideration.

- **Alternate Site Alternative:** Development of the Project at an alternate off-site location would not be consistent with the purpose and objectives of the Project. The underlying purpose of the Project is to revitalize and reinvigorate the culture of ArtCenter as one college within its existing campuses (i.e., Hillside Campus and South Campus) while providing state-of-the-art improvements to enhance the student experience.

  Some of the primary objectives of the Project are to: (1) develop state-of-the-art, modern physical spaces at both campuses, including new and existing facilities, to meet evolving educational demands; (2) support a broader and richer student experience by adding on-campus student housing at the South Campus to encourage 24/7 possibilities for greater social and personal interaction, and creative growth and to provide affordable on-campus housing opportunities for students; and (3) increase the utility of existing and proposed new development on the South Campus.

  As such, the Project is focused on the development of a particular site (i.e., South Campus), which is under the ownership of the Project Applicant. In addition, because there are no sensitive receptors (e.g., receptors sensitive to light, air emissions, noise) that are immediately adjacent to the South Campus,

development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the Project. Therefore, this alternative was rejected from further consideration.

In addition the following alternatives described in more detail in the Draft EIR are considered and rejected as they would not meet the basic project objectives to the same extent as the Project, and/or would not reduce or avoid any of the significant effects of Project as summarized below and described in more detail on pages V-11 through V-53 in Section V, Alternatives, of the Draft EIR..

1. Alternative 1—No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a project on an identifiable property consists of the circumstance under which a proposed project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved, and no new development would occur within the Hillside Campus or the South Campus. Thus, the physical conditions of the two ArtCenter campuses would generally remain as they are today. Under Alternative 1, the existing buildings and parking lots on both campuses would continue to operate as they are currently, and no new construction would occur. Furthermore, no changes to the existing on-site parking or access/circulation areas would occur.

With implementation of mitigation measures, the Project would not result in any significant impacts. The No Project/No Build Alternative would avoid all of the Project's impacts that were determined to be less than significant with mitigation and less than significant. However, Alternative 1 would not meet any of the Project objectives. Specifically, Alternative 1 would not meet the following Project objectives:

- To develop state-of-the-art, modern physical spaces at both campuses, including new and existing facilities, to meet evolving educational demands;
- To support a broader and richer student experience by adding on-campus student housing at the South Campus to encourage 24/7 possibilities for

greater social and personal interaction, and creative growth and to provide affordable
on-campus housing opportunities for students;

- To provide flexible spaces that can easily adapt to multiple uses and accommodate a wide variety of collaborative practices to reflect ArtCenter's transdisciplinary approach to the learning process;

- To create a greater sense of connection between the Hillside Campus and South Campus to enhance the student, faculty, and staff experience and increase the utility of existing and proposed new development on the South Campus;

- To improve access and circulation operations at the Hillside Campus and shuttle routes that facilitate the shift in growth to the South Campus;

- To expand existing sustainable policies, programs, and facilities and lessen the dependence on vehicles;

- To encourage an enhanced campus community through flexible and innovative outdoor and indoor spaces;

- To create a pedestrian-oriented environment defined by a hierarchy of spaces and pathways;

- To establish an urban design framework for the Project Site that responds to on-site conditions and creates a positive interface with the surrounding community; and

- To provide safe pedestrian connections within the South Campus.

Overall, Alternative 1 would not meet any of the Project objectives or the Project's underlying purpose to revitalize and reinvigorate the culture of ArtCenter as one college with multiple locations, while providing state-of-the-art improvements to enhance the student experience. For CEQA purposes, this alternative is rejected because it would not meet any of the project objectives.

2. Alternative 2—Reduced Building Height Alternative

The Reduced Building Height Alternative, which involves changes to the South Campus only, includes the development of the Master Plan pursuant to the maximum height limits established by the CD-6 zoning designation for properties along Arroyo Parkway and by the IG-HL-56 zoning designation for properties along Raymond Avenue. Accordingly, this alternative would reduce the height of the 1101 Building along Arroyo Parkway to a maximum of 50 feet and height of the 988 and 888 Buildings along Raymond Avenue to maximum of 56 feet. This alternative would be code compliant with the exception of the existing legal non-conforming floor area ratio (FAR) condition, specific only to the 1111 Parcel. Other components of the Master Plan related to improvements at the Hillside Campus or the interior renovations to the 1111 and 950 Buildings would remain unchanged from those proposed under the Project.

Due to the reduction in height from approximately 100 feet to 50 feet (along Arroyo Parkway) and 56 feet (along Raymond Avenue), new buildings to be developed on the South Campus would be designed to be no more than four stories in height. To be able to maintain and accommodate the same program as proposed under the Project, the footprint of the new buildings would be expanded to the property line, as allowed by the applicable Specific Plan and Zoning Code. Improvements proposed under this alternative and how they differ from the Project are described below.

a. 1101 Building—Student Housing and Parking

Under this alternative, the 1101 Building would be four stories in height and 50 feet tall, consisting of two levels of housing above a two-story podium with street front amenities that may include a black box theater. Whereas the Project would develop the 1011 Building in an L-shaped configuration on top of a two-story podium, the building under this alternative would be built in a J-shaped configuration with a long single loaded corridor extending between the 1111 Building and the Metro right-of-way (ROW) to Glenarm Street The footprint of the building would be maximized and extended close to the property line along Arroyo Parkway to align with the existing 1111 Building. The common area housing amenities (e.g., common rooms, work rooms, laundry spaces, and recreational/gym areas) proposed by the Project on the third floor would be eliminated to accommodate student housing. Similarly, the stepped gallery that would connect Arroyo Parkway to the third floor would be eliminated. In addition, the major pedestrian connection between the 1101 Building/1111 Building and the 988 Building provided by the Main Quad would be eliminated under this alternative. The

proposed housing would consist of approximately 270 beds as compared to the 350 beds proposed by the Project.

b. 988 Building—Student Housing and Parking

Under this alternative, the 988 Building would be 56 feet tall and four stories in height, consisting of two levels of housing over a two-story podium that would include ground floor amenities and potentially two levels of parking. Whereas the Project would develop the 988 Building in an L-shaped configuration on top of a two-story podium, the building under this alternative would be rectangular in configuration with an interior courtyard in the center.. The footprint of the building would be maximized and extended to the property line. This alternative would not change the first two floors and subterranean levels of the 988 Building as proposed by the Project. However, the main plaza entrance to the South Campus at the Mobility Hub would no longer be open to the sky. In addition, the residential common area amenities (e.g., common rooms, work rooms, laundry spaces, and recreational/gym areas) proposed by the Project on the third floor would be eliminated to accommodate student housing. The student housing in the 988 Building under this alternative would consist of approximately 425 beds as compared to the 500 beds proposed by the Project. Similar to the Project, the ground floor amenities may include an art store, cafeteria, student gallery, coffee shop, retail/café, gym, studio space, storage and equipment, and bike parking/rental facilities. In addition, the 988 Building would include up to two levels of subterranean parking, a central plant, and other heating and cooling equipment.

c. 888 Building

Under this alternative, the 888 Building would be 56 feet tall and four stories in height, consisting of two levels of housing over a two-story podium comprised of approximately 76,000 square feet. Whereas the Project would consist of four buildings that would be comprised of approximately 36,000 square feet each, constructed above a bi-level common podium, the building under this alternative would be rectangular in configuration with an interior courtyard in the center. The footprint of the building would be maximized and extended to the property line. This alternative would not change the first two floors and subterranean levels of the 888 Building as proposed by the Project. However, the residential common area amenities (e.g., common rooms, work rooms, laundry spaces, and recreational/gym areas) proposed by the Project on the third floor and elevated quad area would be eliminated to accommodate student housing and/or institutional space. Under Scenario 1 (all academic uses), this alternative would provide

a slightly smaller space (1,876 square feet less) for academic uses than under the Project. Under Scenario 2 (mix of academic and student housing uses), the student housing floors could accommodate a maximum of 642 beds (or 148 units) as compared to 650 beds (or 150 units) proposed by the Project.

Overall, Alternative 2 would provide 8 fewer beds than Project under Scenario 2 and compromise more than 31,000 square feet of common areas originally planned for student amenities, including life and wellness programs. In addition, this alternative would eliminate almost 50 percent of the open space (e.g., plazas, gardens, quads, pedestrian paths, etc.) proposed by the Project. Other components of the Master Plan related to improvements at the Hillside Campus would remain unchanged from those proposed under the Project.

Alternative 2 would reduce the Project's environmental impacts related to aesthetics as it relates to views, air quality during operation, on-site noise related to outdoor spaces during operation, and utilities and service systems. In addition, the following impacts would be similar to the Project: aesthetics as it relates to visual character, light, and glare (less than significant); biological resources (less than significant with mitigation); cultural and tribal cultural resources (less than significant with mitigation); geology and soils (less than significant); GHG emissions (less than significant); hazards and hazardous materials (less than significant with mitigation); hydrology and water quality during construction (less than significant); noise during construction (less than significant with mitigation) and operation (less than significant) and vibration during construction (less than significant with mitigation); fire protection (less than significant); and traffic (less than significant) and traffic hazards (less than significant with mitigation). However, Alternative 2 would result in greater impacts than the Project related to hydrology (surface water runoff) during operation and land use consistency (enhancement of the urban landscape and environmental quality and maximization of livability, prosperity, and sustainability to contribute to a healthier community) due to the reduction in the amount of publicly-accessible open space provided under this alternative. Nonetheless, these impacts would remain less than significant.

Alternative 2 would not meet all of the Project's objectives. Specifically, Alternative 2 would not achieve the following objectives to the same extent as the Project:

- To expand existing sustainable policies, programs, and facilities and lessen the dependence on vehicles;

- To encourage an enhanced campus community through flexible and innovative outdoor and indoor spaces;

- To create a pedestrian-oriented environment defined by a hierarchy of spaces and pathways; and

- To establish an urban design framework for the Project Site that responds to on-site conditions and creates a positive interface with the surrounding community; and

Overall, Alternative 2 would not achieve the Project objectives to the same extent as the Project and would result in trade-offs in environmental impacts. As such, this Alternative has been rejected from further consideration.

3. Alternative 3: No Encroachment Over and Under the Metro Right-of-Way Alternative

The No Encroachment Over and Under the Metro Right-of-Way Alternative would involve changes to the portion of the Master Plan that pertains to the South Campus only. This alternative would involve development of the Master Plan without the Main Quad or the eastern portion of the 988 Building that cantilevers over the Metro right-of-way (ROW) or an underground tunnel under the Metro ROW to connect the proposed 988 Building subterranean parking with the existing 1111 Building parking to avoid any potential impacts to the operation of the Metro Gold Line. Other components of the Master Plan related to the Hillside Campus, the 888 Buildings, and the interior renovations to the 1111 and 950 Buildings would remain unchanged from those proposed under the Project.

The large main quad area that would connect the 1111, 1101, and 988 Buildings would not be constructed. Similarly, the temporary pedestrian bridge over the Metro ROW would not be installed to provide a connection between the 988 Building and the 1111 Building. Consequently, the pedestrian connection and circulation between ArtCenter's facilities on Arroyo Parkway and Raymond Avenue would be limited to the sidewalk along the north side of Glenarm Street, similar to existing conditions. Without this above-ground connection over the Metro ROW, the provision of publicly-accessible open space, pedestrian paths, planted areas, seating areas, and assembly areas would not occur.

In addition, an underground tunnel would not be constructed under the Metro Gold Line to connect the proposed 988 Building subterranean parking with the existing 1111 Building parking at the second underground level for vehicular circulation. As such, these subterranean parking structures would function and be operated independently. However, when compared with the Project, the mobility hub under the Main Quad would remain unchanged under this alternative. Street access would continue to be provided via South Raymond Avenue, and the mobility hub would provide a central location for transportation options, replacing a multi-entry approach under current conditions. Other components of the Master Plan related to the Hillside Campus, the 888 Buildings, and the improvements to the 1111 and 950 Buildings would remain unchanged from those proposed under the Project.

Alternative 3 would eliminate the Project's environmental impact related to aesthetics (light and glare) and noise associated with nighttime construction, which for the proposed Project was determined to be less than significant with implementation of mitigation. In addition, the following impacts would be similar to the Project: aesthetics as it relates to visual character, views, light, and glare during operation (less than significant); air quality during construction and operation (less than significant); biological resources (less than significant with mitigation); cultural and tribal cultural resources (less than significant with mitigation); geology and soils (less than significant); GHG emissions (less than significant); hazards and hazardous materials (less than significant with mitigation); hydrology and water quality during construction (less than significant); noise during operation (less than significant); vibration during construction (less than significant with mitigation), fire protection (less than significant); traffic (less than significant) and traffic hazards (less than significant with mitigation); and utilities and service systems (less than significant). However, Alternative 3 would result in greater impacts than the Project related to hydrology (surface water runoff) during operation and land use consistency (enhancement of the urban landscape and environmental quality and maximization of livability, prosperity, and sustainability to contribute to a healthier community) due to the reduction in the amount of publicly accessible open space (i.e., elimination of the Main Quad) provided under this alternative, as well as pedestrian safety due to at-grade sidewalk rail crossing as a result of the elimination of the pedestrian crossing over the Metro ROW. Nonetheless, these impacts would remain less than significant.

Alternative 3 would not meet all of the Project's objectives. Specifically, Alternative 3 would not achieve the following objectives to the same extent as the Project:

- To expand existing sustainable policies, programs, and facilities and lessen the dependence on vehicles;

- To encourage an enhanced campus community through flexible and innovative outdoor and indoor spaces;

- To create a pedestrian-oriented environment defined by a hierarchy of spaces and pathways;

- To establish an urban design framework for the Project Site that responds to on-site conditions and creates a positive interface with the surrounding community; and

- To provide safe pedestrian connections within the South Campus.

Overall, Alternative 3 would not achieve the Project objectives to the same extent as the Project and would result in trade-offs in environmental impacts. As such, Alternative 3 is rejected.

4. Alternative 4: Change in Location of the New Commuter Services and Facilities Hub on the Hillside Campus to the North Lot Alternative

When compared with the Project, the Change in Location of the New Commuter Services and Facilities Hub on the Hillside Campus to the North Lot Alternative would involve changes to the portion of the Master Plan that pertains to the Hillside Campus only and specifically the South Building and the new Commuter Services and Facilities Hub. This alternative would involve maintaining the South Building as it currently exists and constructing a new building to accommodate the Commuter Services and Facilities Hub at the North Lot, instead of the South Lot, to avoid any disturbance to the hillside area adjacent to the South Building. The new building would be approximately 15,300 square feet, which would be equivalent in size to the additional building area proposed for the reconstruction/expansion of the existing 4,200-square-foot South Building under the Project. Therefore, no new gross floor area beyond that is proposed under the Project would be added under this alternative.

Similar to the Project, the new facility building at the North Lot would be a maximum of 35 feet in height. The exact location of the new facility is not known at this time, but it

would be within the boundaries of the North Lot; no new construction would occur outside of the North lot. The new building would also allow storage areas currently located in the Ellwood Building to be relocated to this facility, thereby making additional space available in the Ellwood Building for academic and administrative uses. Components of the Master Plan related to other improvements at the Hillside Campus (i.e., demolition of the Annex Building and enclosure of the Sinclaire Pavilion) and the South Campus would remain unchanged from those proposed under the Project.

Alternative 4 would reduce the Project's significant environmental impact related to biological resources and mudflows, which for the proposed Project were determined to be less than significant with mitigation. In addition, the following impacts would be similar to the Project: aesthetics as it relates to visual character, views, light, and glare (less than significant); air quality during construction and operation (less than significant); cultural and tribal cultural resources (less than significant with mitigation); geology and soils (less than significant); GHG emissions (less than significant); hazards and hazardous materials (less than significant with mitigation); hydrology and water quality during construction and operation (less than significant); noise and vibration during construction and operation (less than significant with mitigation); fire protection (less than significant); traffic (less than significant with mitigation); and utilities and service systems (less than significant).

Alternative 4 would achieve the Project objectives pertaining to the Hillside Campus to the same extent as the Project.

The CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the alternatives indicates that Alternative 4 is the Environmentally Superior Alternative. Under Alternative 4, the impacts of the Project related to biological resources and mudflows that were determined to be less than significant with mitigation would be eliminated without resulting in different tradeoffs that were identified for the other two alternatives (i.e., impacts related to hydrology and land use associated with the reduction in open space). However, as indicated above, with implementation of the proposed mitigation measures, the Project would not result in any significant impacts to the environment.

VI. RESOLUTION REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

A. Building Materials and Solid Waste

Solid waste generation during construction and operation of the Project is addressed in Section IV.M.3, Utilities and Service Systems—Solid Waste, of the Draft EIR. Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

During construction of the Project, a construction waste management plan would be implemented to recycle and/or salvage a minimum of 75 percent of non-hazardous

construction debris in accordance with Chapter 8.62, the Construction and Demolition Waste Management Ordinance, of the Pasadena Municipal Code (PMC). Thus, the consumption of non-renewable building materials, such as lumber, aggregate materials, and plastics, would be reduced.

B. Water

The short-term and intermittent water use during construction of the Project would be less than the net new water consumption of the Project at buildout. In addition, the Project falls within the available and projected water supplies for normal, single-dry and multiple-dry years through the year 2040, and the Pasadena Water and Power (PWP) would be able to meet the water demand for the Project in addition to the existing and planned water demands of its future service area. Furthermore, the Project would comply with PWP's water conservation measures and restrictions on wasteful water use, as detailed in Chapter 13.10 of the PMC. Thus, as evaluated in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, while Project operation would result in the irreversible consumption of water, the Project would not result in a significant impact related to water supply.

C. Energy Consumption and Air Quality

During on-going operation of the Project, non-renewable fossil fuels would represent the primary energy source, and, thus, the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.M.4, Utilities and Service System—Energy, of the Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. As the consumption of fossil fuels would occur on a temporary basis during construction, impacts related to the construction consumption of fossil fuels would be less than significant.

The Project's increase in electricity and natural gas demand during Project operation would be within the anticipated service capabilities of PWP and the Southern California Gas Company, respectively. As discussed in Section IV.M.4, Utilities and Service Systems—Energy, of the Draft EIR, the Project would be designed and constructed in accordance with state and local green building standards that would serve

to reduce the energy demand of the Project. Specifically, the Project would comply with the City's Green Building Standards. To further offset electricity consumption, the Project will also install photovoltaic (PV) solar cells and canopies at the North and South lots on the Hillside Campus and on the roof of the 988 Building on the South Campus. With regard to transportation fuel, the Project would minimize petroleum-based fuel consumption through the reduction of VMT by providing on-campus student housing, increasing the frequency of ArtCenter shuttles, providing bicycle-serving amenities, and improving pedestrian accessibility through Project design. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans or violate state or federal energy standards.

D. Conclusion

Based on the above, Project construction and operation would require the irretrievable commitment of finite, slowly renewable, and non-renewable resources, which would limit the availability of these resources for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant. Considering that the Project would consume an immaterial amount of natural resources and result in improvements to an existing urban use primarily on an infill site at the South Campus, the limited use of non-renewable resources is justified. (Draft EIR pp. VI-1 through VI-4.)

VII. RESOLUTION REGARDING GROWTH-INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth inducement, however, is not considered necessarily detrimental, beneficial, or significant to the environment.

While the Project includes new on-campus housing, this use is typically not considered residential development for purposes of local or regional growth projections. At Project buildout, the Project would result in 500 additional full-time equivalent (FTE) students and approximately 1,500 on-campus residents in the proposed student housing buildings. Many of the students, who may choose to live on campus, may already live in the City of Pasadena. However, even conservatively assuming all of the new students may move from outside the City, this increase in population would be within regional growth projections.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Accordingly, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project, and, therefore, no new permanent residents are anticipated as a result of Project construction.

Regarding operation of the Project, the proposed academic uses would include a limited number of full-time and part-time positions. However, the overall increase of 241 faculty/staff members on campus would be within regional growth projections. As such, it is unlikely that the Project would create an indirect demand for additional housing or households in the area. Typically, the jobs associated with maintenance and operation of the new facilities would be filled to some extent by employees already residing in the vicinity of the Project Site. However, it is also possible that some of these jobs would be filled by persons moving into the surrounding area, and housing demand associated with the Project could increase. Nevertheless, it is anticipated that some of this demand would be filled by existing vacancies in the housing market and some from other new units in nearby developments. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees, who may relocate their place of residence, would not be substantial. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Pasadena. Furthermore, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, it would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population growth. Therefore, impacts related to population growth would be less than significant. (Draft EIR, pp. VI-4 and VI-5).

VIII. RESOLUTION REGARDING ADOPTION OF MITIGATION MONITORING AND REPORTING PROGRAM

Pursuant to Public Resources Code Section 21081.6, the City Council hereby adopts the Mitigation Monitoring and Reporting Plan ("MMRP") attached to this Resolution as Attachment #1, and incorporated herein. This MMRP includes all of the mitigation measures analyzed in the EIR that are applicable to the Project.

IX. RESOLUTION REGARDING CUSTODIAN OF RECORDS

The documents and materials that constitute the record of proceedings on which these findings are based are located at the City of Pasadena, Planning & Community Development Department at 175 North Garfield Avenue, Pasadena, California 91101 and with the Director of Planning & Community Development, who serves as the custodian of these records.

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X. RESOLUTION REGARDING NOTICE OF DETERMINATION

Staff is directed to file a Notice of Determination with the Clerk of the County of Los Angeles within five working days of certification of the EIR and final approval of Refined Alternative 2, as may be further modified by any conditions of approval imposed by the City Council.

Adopted at the regular meeting of the City Council on 18th day of June 2018, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

_____
MARK JOMSKY
CITY CLERK

APPROVED AS TO FORM:

_____
THERESA E. FUENTES
ASSISTANT CITY ATTORNEY

Exhibit A: Mitigation Monitoring and Reporting Program