found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within this buffer until the avian biologist has confirmed that breeding/ nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist. (SCEA, p. 66)

SCAG RTP/SCS EIR Mitigation Measures

MM-BIO-4(b):

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and polices of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur
- Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino
- Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement
- Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California

Code of Regulations protecting fur-bearing mammals, during the breeding season

- Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible
- Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31
- Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors
- Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season
- Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDB by a qualified biologist to determine the risk of habitat fragmentation
- Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat)
- Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible
- Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of

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

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

- Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas (SCEA, p. 67-69)

MM-BIO-5(b):

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources
- Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist
- If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species
- Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree
- Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground

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

- Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree
- Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration
- If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed
- Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations
- Design projects to avoid conflicts with local policies and ordinances protecting biological resources
- Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
  - Avoidance strategies
  - Contribution of in-lieu fees
  - Planting of replacement trees at a minimum ratio of 2:1
  - Re-landscaping areas with native vegetation post-construction
  - Other comparable measures (SCEA, p. 69-70)

Pasadena General Plan EIR Mitigation Measures

3.3: The City of Pasadena shall require applicants of development project to avoid potential impacts to sensitive or protected biological resources to the greatest extent feasible. Depending on the resources potentially present on the project site, avoidance may include: 1) establishing appropriate no-disturbance buffers around onsite or adjacent resources, and/or 2) initiating construction at a time when special status or protected animal species will not be vulnerable to project-related mortality (e.g., outside the avian nesting season or bat maternal or wintering roosting season). Consultation with relevant regulatory agencies may be required in order to establish suitable buffer areas. If the project avoids all sensitive or protected biological resources, no further action is required. If avoidance of all significant impacts to sensitive or protected biological resources is not feasible, the project shall implement Mitigation Measure 3-4.

3.4: The City of Pasadena shall require applicants to design development projects to minimize potential impacts to sensitive or protected biological resources to the greatest extent feasible, in consultation with a qualified biologist and/or appropriate regulatory agency staff. Minimization measures may include 1) exclusion and/or silt fencing, 2) relocation of impacted resources, 3) construction monitoring by a qualified biologist, and 4) an informative training program conducted by a qualified biologist for construction personnel on sensitive biological resources that may be impacted by project construction. If minimization of all significant impacts to sensitive or protected biological resources is infeasible, the project shall implement Mitigation Measure 3-5.

3.5: A qualified biologist will develop appropriate mitigations that will reduce project impacts to sensitive or protected biological resources to a less than significant level, if feasible. The type and amount of mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigations may include, but are not limited to: 1) compensation for lost habitat or waters in the form of preservation or creation of in-kind habitat or waters, either onsite or offsite, protected by conservation easement; 2) purchase of appropriate credits from an approved mitigation bank servicing the Pasadena area; and 3) payment of in-lieu fees. (SCEA, p. 71)

iii. Findings Pursuant to CEQA Guidelines Section 21155.2

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the SCEA.

iv. Supporting Explanation

The project site is located in the East Pasadena Specific Plan area, which is an urbanized portion of Pasadena. As shown in Figure 5.3-1 Vegetation Zones of the Pasadena General Plan EIR (Pasadena 2015a), the project site is not located within a vegetated or open space area. There is no vegetation currently on-site apart from street trees that line the building frontage along Foothill Boulevard. The site does not contain native habitat and does not support any candidate, sensitive, or special-status species. However, construction of the proposed Project would involve removal of the street trees along the building frontage that would be replaced after project completion. Although no sensitive biological species, including migratory birds, are known to use these trees as habitat, the MM-BIO-1 would be implemented to ensure that there would be no impacts to migratory birds during tree removal.

The proposed project would also be required to comply with mitigation measures MM-BIO-4(b) and MM-BIO-5(b) of SCAG's 2016 RTP/SCS EIR relating to protection of trees and wildlife species, as well as applicable mitigation measures provided in the 2015 Pasadena General Plan EIR provided below. Therefore, with implementation of the above mitigation measure, tree removal activities for the proposed project would not affect potential migratory birds and therefore impacts would be less than significant. (SCEA, p. 66-71)

c. CULTURAL RESOURCES

i. Potential Significant Impacts Evaluated

- Would the project cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5? (SCEA, p.75)
- Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5? (SCEA, p. 75)
- Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (SCEA, p. 75)

ii. Proposed Mitigation

MM-CR-1: Recordation

The applicant shall be responsible for recordation of the site to the satisfaction of the City of Pasadena. Documentation shall include narrative text and selective photographs per HABS/HAER Documentation Level II, including large-format photographs of key illustrative views of selected features and written data describing the history and use of the resource. Documentation should also include reproduction of historic photographs, where available. Existing drawings, if available, should be photographed with large-format negatives or photographically reproduced on Mylar. Documentation shall be prepared by a qualified consultant who meets the Secretary of the Interior's Professional Qualifications standards in history and/or architectural history. Documentation shall be provided to the Library of Congress where it will be appropriately archived and publicly accessible and offered to U.S. Naval Museum of Armament & Technology at NAWS China Lake, the Navy's Space and Naval Warfare Systems Center Pacific, the Pasadena Public Library, and Pasadena Heritage. All photography of selected features shall be completed prior to the issuance of the first demolition permit issued by the City of Pasadena for removal of the buildings at the site. The balance of the HABS/HAER documentation shall be completed within 180 days following the issuance of said demolition permits. (SCEA, p. 87)

MM-CR -2: Interpretive Program

The Applicant shall, in consultation with an expert in museum curation and/or the history of the United States Navy and armament program ("Interpretive Consultant"), develop information to be used in connection with an on- site interpretive project ("Interpretive Program"), interpreting and illustrating:

- The creative, engineering, manufacturing and administrative activities and events that took place and products developed at the Pasadena NOTS complex,
- How these activities and events were associated with national research, development and production efforts for the Navy and national defense,
- Innovations and products developed at the plant and how these important events contributed significantly to the larger defense effort. The Interpretive Program shall highlight significant innovations and products developed at the plant and show how these important events contributed significantly Pasadena's role in the national defense efforts,
- The Interpretive Program shall identify key individuals who worked at the site, their personal histories, credentials, roles and accomplishments related to the site.

The Interpretive Program shall include publicly accessible displays placed or housed on the site and incorporated as part of any future use and development of that property (e.g., interpretative elements incorporated as part of publicly accessible open space features). Copies of the Interpretive Program shall also be provided to the Pasadena Public Library. The interpretive plan shall display four important historic elements on-site in a manner consistent with the 3200 E. Foothill Historical Elements Interpretive Plan as illustrated Appendix E and as described below:

Flagpole

The existing flagpole shall be retained and relocated to the Southeast corner of East Foothill Boulevard and the Santa Paula entrance into the project. As it is customarily used, it shall mark an important threshold into the property, and reinforce the notion of 'gateway'. It shall anchor a substantial public corner, and continue to be used as a functional flagpole connected with ongoing events with the project's public spaces.

Anchor Symbol

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

Torpedo Monument

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

Variable Atmospheric Tank

The Variable Atmospheric Tank ("Tank") is comprised of three chamber segments and a crown. More than half of the lower segment is encased in concrete and not salvageable. All of the above-ground portions, as well as the crown, shall be salvaged and reconstructed in the center of the project site, and reside within a park space organized around the Tank itself. The Tank shall be

placed upon an expansive square of crushed aggregate or perhaps lawn and ringed by a bosque of canopy trees. The Tank shall occupy a "public room" that forms a quiet contemplative space where the significance of the Tank and its role in U.S. Naval history can be appropriately conveyed.

Interpretive Information Distributed through Site

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

Prior to issuance of a demolition permit, the City of Pasadena Planning Department shall review approve the Final Interpretive Program. The approval shall make the finding that the interpretive program is in substantial conformance with the above described program elements. The interpretive program shall be publicly accessible and privately maintained by the project applicant, the successor in interest (if any), and/or the leasing entity.

MM-CR -3: General Plan Mitigation Measure 4-1
If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report. (SCEA, p. 91)

MM-CR-5: Unanticipated Discovery of Paleontological Resources
In the event a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a qualified paleontologist in accordance with Society of Vertebrate Paleontology standards. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant, the paleontologist shall design and carry out a data recovery plan consistent with SVP standards (2010). (SCEA, p. 92)

SCAG 2016 RTP/SCS EIR Mitigation Measures

MM-CUL-1(b):

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature.
- Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources.
- Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible:
- All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
- Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP.

- Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
- Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas.
- Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance.
- Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.

MM-CUL-2(b):

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified.
- Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is

warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project.

- Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.
- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource.
- Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.
- Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified.
- Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.

- If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property.
- Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated.
- Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.

MM-CUL-4(b):

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060 and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
- If any discovered remains are of Native American origin:
  - Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased

individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.

- If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 2448 hours after being allowed access to the site notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur:
  - The Native American Heritage Commission is unable to identify a descendent;
  - The descendant identified fails to make a recommendation; or
- The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner

Pasadena General Plan EIR Mitigation Measures

4.1:
If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.

iii. Findings Pursuant to CEQA Guidelines Section 21155.2

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the SCEA.

iv. Supporting Explanation

The project historically functioned as a research and development (R&D) center for underwater ordnance, and was first operated by Caltech during World War II, then under the jurisdiction of the U.S. Navy during the Cold War years of 1948 through the early 1970s. The theme of weapons R&D, was typically a collaborative process that included the efforts of military personnel, private contractors, and universities, and set the most appropriate theme in which to evaluate the project site (JRP Historical Consulting Services 2000). The period of significance for this theme generally follows the timeline of the Cold War, beginning in 1946 and ending in 1989.

According to the CEQA Guidelines, a project would result in a significant impact to historical resources if it would cause a substantial adverse change in the significance of an historical resource. A substantial adverse change is defined in CEQA Guidelines §15064.5(4)(b)(1), as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." While demolition would certainly materially impair the subject property, upon implementation of the mitigation measures in the SCEA, demolition would not cause a significant impact under CEQA.

In this specific circumstance, the former Foothill Plant of the Naval Ordnance Test Station (presently the Space Bank Mini Storage facility) is currently not open to the public and thus does not provide any information to the public as to the association with important events in Cold War history. The site is not visibly distinguishable from other similar industrial properties in the City of Pasadena and the activities that took place at the site were top secret and the buildings were intended to conceal the top-secret nature of the research taking place within the buildings. This fact is further reinforced in the City's historic context report, "Cultural Resources of the Recent Past" (2007), which does not identify the subject property as a historic resource. However, the nondescript and undistinguishable buildings within the project site are important to the history of the Cold War.

Therefore, in addition to the proposed residential and commercial development, the project proposes to retain the objects identifying the property with its significance as a research and development laboratory for torpedo development during the Cold War.

These objects include the flagpole at the north side of the site, a Navy medallion that appears as an anchor seal located on a gate leading into the site, and the Variable Atmospheric Tank located in the existing Building 5 (see Figure 7). These objects are proposed to be retained as the basis of an on-site interpretive program. The flagpole is proposed to be relocated slightly west of its current location on Foothill Boulevard, maintain its relationship with the street and serving as a sign to automobile traffic. The anchor seal is proposed to be relocated slightly to the east as a ground-mounted plaque, identifying the site's pedestrian entrance into the site. The Variable Atmospheric Tank is proposed to be relocated onto a new concrete mount within the proposed central park. The proposed location of this feature would be visible from many areas within the development as well as from Foothill Boulevard. Finally, a reconstructed concrete torpedo monument, which can be seen in historic photographs at the entrance to the property, would also be placed within the central park.

The on-site interpretive program would retain/reconstruct and exhibit four objects highly descriptive of the history of the site. The flagpole and anchor seal would serve to identify the historic ownership of the site to passing cars and pedestrians. The torpedo and the Variable Atmospheric Tank would further distinguish the property as a historic resource and would create opportunities for the public gain a significantly more thorough understanding of the property's role in the engineering and development of new weapons systems during the close of World War II and throughout the Cold War than the retention of the on-site buildings.

Additionally, the ground surface on the project site is completely obscured by structures or paving, which makes it impossible to definitively identify the presence of archaeological resources without conducting invasive ground investigations. Though no records of previously recorded archaeological resources were identified, in the event that archaeological resources are discovered during construction of the project, particularly during excavation for the subterranean parking garage, impacts could be potentially significant.

The project site is located within the large older alluvial fan complex created by the historical Eaton Wash drainage and extending from the south flank of the San Gabriel Mountains, approximately two miles to the north. The project site is situated more than 500 feet east of the modern concrete-lined Eaton Wash channel and is entirely underlain by Holocene (11,700 years ago to the present) gravel and sand deposited along the original stream channel,. At this relative proximity to the sediment source and mouth of the Eaton Wash at nearby Eaton Canyon, the lithology of the Holocene stream channel deposits are dominated by coarse pebbles to sand, with clast sized decreasing with increasing distance from the source (Dibblee and Ehrenspeck 1998). These younger Holocene deposits are underlain at an unknown depth by the

incised older Quaternary alluvial fan deposits of Pleistocene age (2.58 million years ago to 11,700 years ago).

Quaternary alluvial, fluvial and lacustrine deposits of Pleistocene age have proven to yield scientifically significant paleontological resources, such as Ice Age mammals, throughout southern California from the coastal areas to the inland valleys (Springer et al. 2009). However, the surface of the project area is immediately underlain by the much younger Holocene fluvial gravel and sand which are generally too coarse and too young to contain fossilized material, though they may overlie sensitive older deposits at an unknown depth (SVP 2010). Therefore, based on the sensitivity rankings of the SVP (2010), sedimentary rocks in the project area have low paleontological sensitivity. Nevertheless, in the event that paleontological resources are discovered during construction of the project, particularly during excavation for the subterranean parking garage, impacts could be potentially significant and MM-CR-5 would be implemented to temporarily halted construction until the discovery is examined by a qualified paleontologist. If the find is determined to be significant, the paleontologist shall design and carry out a data recovery plan consistent with SVP standards.

In addition, the proposed project would also be required to comply with mitigation measure MM-CUL-1(b), MM-CUL-2(b), and MM-CUL-4(b) of SCAG's 2016 RTP/SCS EIR regarding protection of historical resources, as well as with the applicable mitigation measures provided in the 2015 Pasadena General Plan EIR.

d. HAZARDS AND HAZARDOUS MATERIALS

i. Potential Significant Impacts Evaluated

- Would the proposed project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Would the proposed 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?
- Would the proposed project located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (SCEA, p. 119)

ii. Proposed Mitigation

SCAG 2016 RTP/SCS EIR Mitigation Measures

MM-HAZ-1(b):

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials
- Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible
- Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials
- Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project
- Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The

Hazardous Materials Business/Operations Plan should include the following:

- The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids
- The location of such hazardous materials
- An emergency response plan including employee training information.
- A plan that describes the manner in which these materials are handled, transported and disposed
- Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects
- Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction
- Avoid overtopping construction equipment fuel gas tanks
- During routine maintenance of construction equipment, properly contain and remove grease and oils
- Properly dispose of discarded containers of fuels and other chemicals (SCEA, p. 122-123)

MM-HAZ-4(b):

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Clean-up Act, and the Uniform Building Code, and County and City building standards, and all applicable federal, state, and local laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects
- Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer
- Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action
- Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans
- Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building
- Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps
- Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency
- Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area

as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority

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

presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law

- Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials
- Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials (SCEA, p. 126-129)

MM-HAZ-1:
Any surface water remaining onsite in connection with historical research and development of weapons systems, in particular, water located in the anechoic tank within Building 5 and surface water reportedly present in Building 103, shall be properly characterized, i.e., water samples collected and analyzed for COCs by a state-certified laboratory. Analytical results will determine if the waste water will be classified as a non-hazardous or hazardous waste. Handling and transport of waste water shall be conducted in accordance with applicable local, state and federal regulations, including EPA RCRA (40 CFR Part 262), Federal and State OSHA, DOT, and DTSC (CCR Title 22). (SCEA, p. 126)

MM-HAZ-2:
If, following installation of groundwater monitoring wells and deep soil analytical analysis for perchlorate required by the DTSC, and prior to final installation of landscaping and Low Impact Development measures, DTSC determines perchlorate is present in soil at concentrations that may pose a threat to groundwater, , then the applicant shall undertake measures that DTSC may require of the applicant to reduce water migration through the vadose zone

resulting from irrigation and surface water infiltration to the satisfaction of DTSC and the City of Pasadena, such as implementing water conservation practices and requiring a review of the design for the stormwater capture and recharge associated with the low impact development measures. (SCEA, p. 126)

MM-HAZ-3:
Contaminated soil and water generated during groundwater monitoring well installation and groundwater sampling activities shall be stored in appropriate waste containers, which shall be stored in a secured location such that residents will not come into contact with contaminated materials. Contaminated soil shall be stored in a roll-off bin or similar container, and water shall be stored in 55-gallon DOT-approved steel drums. Handling and transport of waste shall be conducted in accordance with applicable local, state and federal regulations, including EPA RCRA (40 CFR Part 262), Federal and State OSHA, Department of Transportation, and DTSC (CCR Title 22). (SCEA, p. 126)

MM-HAZ-4:
Should future sampling events result in the installation of a groundwater remediation system onsite, the system shall be located in a locked compound such that residents will not come into contact with contaminated water or other materials used for remediation. Handling and transport of waste generated during the operation of the remediation system shall be conducted in accordance with applicable local, state and federal regulations, including EPA RCRA (40 CFR Part 262), Federal and State OSHA, Department of Transportation, and DTSC (CCR Title 22). (SCEA, p. 126)

iii. Findings Pursuant to CEQA Guidelines Section 21155.2

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the SCEA.

iv. Supporting Explanation

The project involves construction activities associated with removal of the existing uses, excavation and disposal of contaminated soil and storm drain features, grading, and construction and operation of a 550-unit mixed-use (residential and commercial) development. Due to the historical use and identified contamination present, the project site is currently listed as a State Response facility and the DTSC is currently providing oversight for environmental assessment and proposed remediation,

as discussed in the Project Description. COCs include metals, PAHs, dioxins and furans, perchlorate and VOCs in soil and VOCs in soil vapor.

Soil remediation and removal of the storm drain system will involve the excavation of impacted soil and sediments, and the transport of these materials to an offsite disposal facility. However, risks associated with these activities will be reduced to a less than significant level, as excavation and transport activities are required to be conducted in accordance with the RAW. As outlined in the RAW, excavation activities will be conducted in accordance with SCAQMD Rules 403, 1166, and 1466. Dust suppression will be conducted and VOCs will be monitored during excavation activities. In addition, construction activities will be conducted in accordance with requirements of the Construction Activities Storm Water General Permit, and best management practices in accordance with the site-specific stormwater pollution prevention plan (SWPPP) will be implemented which would prevent contaminated soils from migrating offsite. Furthermore, soil removal activities will be conducted in accordance with applicable laws and regulations of EPA RCRA, Federal and State Occupational Safety Health Administration (OSHA), Department of Transportation (DOT), and the DTSC (CCR Title 22) for the characterization, excavation, and off-site transport/disposal of contaminated soil, as outlined in Ninyo & Moore's Transportation Plan, included as Appendix A of the 2017 RAW. Further, the proposed project would be subject to mitigation measure MM-HAZ-1(b) from SCAG's 2016 RTP/SCS EIR, provided below, with regard to compliance with applicable federal regulatory provisions for transport of hazardous material.

Construction activities may also involve the routine transport, use, or disposal of hazardous materials such as petroleum-based fuels or hydraulic fluid used for construction equipment. However, for all transport and disposal activities, the construction contractor would be required to use standard construction controls and safety procedures that would minimize the potential for hazards associated with the transport, use, and disposal of hazardous materials. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, state, and federal law.

Any water remaining in the anechoic chamber historically used for testing torpedoes in Building 5, in addition to surface water reportedly present in Building 103, may need to be disposed of due to elevated levels of cadmium, copper, lead, mercury, chromium, and/or TPH. These waters will need to be properly characterized, i.e., samples collected and analyzed for COCs by a state-certified laboratory prior to disposal. Depending on analytical results, disposal of the water may represent a risk during handling and transport. Therefore, construction activities associated with the proposed project would involve the transport to and disposal of these hazardous

materials at an approved disposal facility. However, hazards associated with transport and disposal could be reduced to less than significant with the implementation of mitigation measure HAZ-1.

Operation of the proposed project would not involve the use or storage of hazardous substances other than the small amounts of cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in the regular maintenance of buildings and landscaping.

While the risk of exposure to hazardous materials cannot be entirely eliminated, best practices and adherence to the RAW can be implemented to reduce risk to acceptable levels. Adherence to Mitigation Measure HAZ-1, existing regulations as outlined in the RAW (which would ensure compliance with safety standards related to the use and storage of hazardous materials), and the safety procedures mandated by applicable federal, state, and local laws and regulations, would ensure that risks resulting from the routine transportation, use, storage, or disposal of hazardous materials or hazardous wastes associated with implementation of the proposed project would be less than significant.

During construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, state, and federal law.

However, with the implementation of the RAW and mitigation measure HAZ-1, as well as utilization of standard construction controls and safety measures in the handling and transport of these materials, the risk of accidental release would be minimized and overall risk of release would be less than significant.

Additionally, as discussed in the *Description of Project* section of the SCEA, perchlorate may be present in deeper soil and groundwater. Due to its soluble nature, if present, there is potential for landscaping irrigation and storm water to exacerbate migration of perchlorate to groundwater. However, implementation of mitigation measure HAZ-2 would reduce the potential hazard to a less than significant level.

Installation of groundwater monitoring wells would generate potentially contaminated soil. In addition, potentially contaminated waste water may be generated during decontamination of drilling equipment such as augers and samplers. As these wastes will likely be stored onsite pending disposal at a licensed facility, there is a potential for residents to be exposed to these wastes. However, hazards associated with the storage of waste generated during well installation activities would be reduced to a less than significant level with implementation of mitigation measure HAZ-3.

According to the DTSC's Amendment to Agreement to Agreement Not to Sue, the obligatory scope of work for this project will have been completed at the end of four quarters of groundwater monitoring. Any additional assessment or remediation will occur under a separate DTSC action. However, once groundwater monitoring events have been completed, results will be evaluated to determine if additional assessment and/or onsite remediation is warranted. If a groundwater remediation system is installed onsite, residents could potentially be exposed to contaminated water generated by the system operation and other materials used for treating groundwater, such as activated carbon. These wastes will be temporarily stored onsite pending delivery to a licensed disposal facility. However, potential hazards associated with waste storage would be reduced to less than significant with implementation of mitigation measure HAZ-4.

Further, the project would be subject to mitigation measure MM-HAZ-4(b) of SCAG's 2016 RTP/SCS EIR which would ensure compliance with applicable federal provisions governing hazardous waste sites. (SCEA, p. 125)

e. NOISE

i. Potential Significant Impacts Evaluated

- Would the project expose persons to, or generation of, excessive groundborne vibration or groundborne noise levels? (SCEA, p. 145)

ii. Proposed Mitigation

Pasadena General Plan Mitigation Measures

9.5: Prior to issuance of construction permits, applicants for new development projects within 500 feet of noise-sensitive receptors shall implement the following best management practices to reduce construction noise levels:

- Consider the installation of temporary sound barriers for construction activities immediately adjacent to occupied noise-sensitive structures.
- Equip construction equipment with mufflers.

- Restrict haul routes and construction-related traffic.
- Reduce nonessential idling of construction equipment to no more than five minutes.
- The identified best management practices shall be noted on all site plans and/or construction management plans and submitted for verification to the City of Pasadena Planning Division.

MM-N-1: Construction Equipment
Prior to the issuance of grading permits, the applicant shall submit the construction equipment list to the City's Planning and Community Development Department for approval. The Department shall enforce the following construction requirements:

- Large bulldozers (i.e., those greater than 312 horsepower)1 shall not be used for any construction activities (e.g., grading, building shell construction, or utility connection activities) within 420 feet of the Kaiser Permanente medical building to the east, 120 feet of the PCC Education Center and commercial uses to the north, and 225 feet of the single-family residences to the north. Instead, small bulldozers (i.e., those not exceeding 104 horsepower)2 or other similarly sized equipment shall be used, where necessary, within 420 feet of the Kaiser Permanente medical building, 120 feet of the PCC Education Center, and 225 feet of the single-family residences.

MM-N-2: Construction Vibration Monitoring Program
The applicant shall conduct on-site monitoring to ensure construction operations do not exceed the Caltrans vibration criteria reported in Table 7 of the Transportation and Construction Vibration Guidance Manual (2013). If vibration is found to approach the applicable standards, then additional measures shall be implemented to reduce vibration at impacted sensitive receptors to the maximum extent feasible. Examples of measures that may be implemented during project construction include, but are not limited to:

- Locating haul routes and truck loading operations at an effective distance from nearby sensitive receptors so as to reduce offsite vibration at these offsite buildings; and
- Phasing construction equipment operations to avoid simultaneous operation of equipment near sensitive receptor locations to reduce vibration levels.

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[1] *Large bulldozers tend to range between 312 – 862 horsepower (CAT 2017).*
[2] *Small bulldozers tend to range between 80-104 horsepower (CAT 2017).*

iii. Findings Pursuant to CEQA Guidelines Section 21155.2

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the SCEA.

iv. Supporting Explanation

A Noise Study was prepared for the proposed project in November 2017. The following analysis is based on the findings of the Noise Study, which is included as Appendix G of the SCEA (p. 145). Temporary construction activity associated with the project would create ground-borne vibration. Buildings in the vicinity of a construction site respond to vibration to varying degrees ranging from imperceptible effects at the lowest levels, to low rumbling sounds and perceptible vibrations at moderate levels, and up to minor damage at the highest vibrations levels. Vibration levels were calculated for the proposed project at the adjacent sensitive receptors to the nearest project boundary to determine if project construction would generate vibration levels that would cause human annoyance or physical damage to nearby structures. Therefore, the modeled sensitive receptor distances were 50 feet for the nearby Kaiser Permanente medical office/urgent care facility, 100 feet for the PCC Education Center and commercial uses to the north, 200 feet for the nearest single-family residences to the north, and 450 feet for the apartment building to the east. To determine vibration impacts during project construction, vibration levels were calculated at the nearest receptors using the PPV of the highest impact piece of equipment that would be used during project construction, which would be dozers and loaded trucks. Table 22 in the Noise section of the SCEA (p. 157) shows the groundborne vibration levels from large bulldozers, loaded trucks, and small bulldozers at various distances associated with the nearby receptors.

Construction vibration could exceed the Caltrans PPV vibration threshold of 0.004 inches per second at the adjacent Kaiser Permanente medical building, 0.016 inches per second at the PCC Education Center and commercial uses, and 0.008 inches per second at single-family residences. However, implementation of the above mitigation measures would reduce vibration levels at these sensitive receptors to a less than significant level. (SCEA, p. 157-158)

f. TRANSPORTATION AND TRAFFIC

i. Potential Significant 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? (SCEA, p. 181)

ii. Proposed Mitigation

MM-TRA-1: Transportation Demand Management Plan Strategies

To reduce the project's VT per capita, the applicant shall develop and implement Transportation Demand Management (TDM) Plan strategies that would reduce the project's vehicle trips by a minimum of 23%, as detailed below under Mitigation Measure TRA-1. Implementation of a TDM would also be in compliance with the mitigation measures stipulated in the East Pasadena Specific Plan EIR.
Project strategies shall go beyond the City's Trip Reduction Ordinance (TRO) and shall include:

- Provide unbundled parking for residential uses
- Provide 275 Metro EZ passes for interested residents at 50% discount for five consecutive years from the issuance of the Certificate of Occupancy. If at the time of Certificate of Occupancy issuance, the Metro Board has expanded its employee-based "whole building" transit passes program to residential projects, the applicant shall purchase 575 annual passes and offer them to residents at 50% discount for five consecutive years from the issuance of the Certificate of Occupancy
- Complete various improvements at the bus stops serving the property, which may include sidewalk improvements, transit amenities, and the installation of BusFinders to improve accessibility and provide the real-time predicted arrivals of buses. The applicant shall coordinate the implementation of the improvements with the Transit Division of the City's Department of Transportation at the following transit stops:
  - Westbound Foothill Boulevard/Santa Paula Avenue
  - Eastbound Foothill Boulevard/Kinneloa Avenue
  - Southbound Kinneloa Avenue/Foothill Boulevard; and
- Complete an annual TDM Survey beginning one year after the issuance of a Certificate of Occupancy for five consecutive years (SCEA, p. 184)

The City's Department of Transportation has determined that by implementing the strategies under Mitigation Measure TRA-1, the project's VT impact would be reduced to a less than significant level. The proposed project would also be

subject to mitigation measure MM-TRA-1(b) of SCAG's RTP/SCS EIR which would further reduce impacts.

SCAG 2016 RTP/SCS EIR Mitigation Measure

MM-TRA-1(b):

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:

- Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation
- Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides
- Provide a vanpool for employees
- Fund capital improvement projects to accommodate future traffic demand in the area
- Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including:
  - Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement
  - Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document)
  - Signage and striping onsite to encourage bike safety

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

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

Project Selection

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

Public Involvement

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

Transit and Multimodal Impact Fees

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

System Monitoring

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

Arterial Traffic Management

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

Signal Synchronization

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

HOV Lanes

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

Delivery Schedules

- Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas
- Implement and supporting trip reduction programs
- Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives
- Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities

Bicycle and Pedestrian Trails

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

Bicycle Safety Program

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

Bicycle Parking

- Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists)
- Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:
  - Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation
  - Eliminate or reduce minimum parking requirements for new buildings
  - "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space)
  - Use parking pricing to discourage private vehicle use, especially at peak times
  - Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities
  - Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times
  - Encourage shared parking programs in mixed-use and transit-oriented development areas

- Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including:
  - Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking
  - Encourage special event center operators to advertise and offer discounted transit passes with event tickets
  - Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking
  - Promote the use of bicycles by providing space for the operation of valet bicycle parking service

Parking "Cash-out" Program

- Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use.

Pedestrian and Bicycle Promotion

- Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.

Fleet Replacement

- Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models. (SCEA, p. 185-189)

MM-TRA-2(b)

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through

adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions:

- Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation:
  - Advocate for a regional, market-based system to price or charge for auto trips during peak hours
  - Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation
  - Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology
  - Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation
  - Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay
- Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency:
  - A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes

- Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur
- Location of construction staging areas for materials, equipment, and vehicles at an approved location
- A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit
- Provision for accommodation of pedestrian flow
- As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces
- Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense., within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, r Repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy
- Any heavy equipment brought to the construction site shall be transported by truck, where feasible
- No materials or equipment shall be stored on the traveled roadway at any time
- Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion
- All equipment shall be equipped with mufflers
- Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors

- Promote "least polluting" ways to connect people and goods to their destinations

- Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency:
  - Ensure transportation centers are multi-modal to allow transportation modes to intersect
  - Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail
  - To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges
  - Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations
  - Coordinate schedules and routes across service lines with neighboring transit authorities
  - Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles)
  - Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so
  - Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles
  - Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets
  - Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible

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

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

- Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including:
  - Provide assistance to regional and local ridesharing organizations
  - Advocate for legislation to maintain and expand incentives for employer ridesharing programs
  - Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes
  - Provide public recognition of effective programs through awards, top ten lists, and other mechanisms
  - Implement a "guaranteed ride home" program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program
  - Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations
  - Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers
  - Work with existing shuttle service providers to coordinate their services

- Facilitate employment opportunities that minimize the need for private vehicle trips, including:
  - Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations
  - Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate
  - Enforce state idling laws for commercial vehicles, including delivery and construction vehicles
  - Organize events and workshops to promote GHG-reducing activities

- Implement a Parking Management Program to discourage private vehicle use, including:
  - Encouraging carpools and vanpools with preferential parking and a reduced parking fee
  - Institute a parking cash-out program
  - Renegotiate employee contracts, where possible, to eliminate parking subsidies
  - Install on-street parking meters with fee structures designed to discourage private vehicle use
  - Establish a parking fee for all single-occupant vehicles
  - Work with school districts to improve pedestrian and bicycle to schools and restore school bus service
  - Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities
  - Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency
  - Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers
  - Synchronize traffic signals to reduce congestion and air quality
  - Work with community groups and business associations to organize and publicize walking tours and bicycle evens
  - Support legislative efforts to increase funding for local street repair (SCEA, p. 190-195)

iii. Findings Pursuant to CEQA Guidelines Section 21155.2

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the SCEA.

iv. Supporting Explanation

The City's Department of Transportation prepared a Transportation Impact Analysis (TIA) for the proposed project. The TIA analyzed the impact the proposed

project would potentially have on the City's transportation system by estimating incremental changes in VMT per capita, VT per capita, service population proximity access to transit and bicycle facilities, and walk accessibility score.

For the TIA, the City's calibrated travel demand forecasting model (TDF), which was built on SCAG's regional model was used to analyze the proposed project's impacts. The City's TDF model simulates traffic levels and travel patterns for the City. The model consists of input files that summarize the City's land uses, street network, travel characteristics, and other key factors. Using this data, the model performs a series of calculations to determine the amount of trips generated, the beginning and ending location of each trip, and the route taken by the trip. The following analyses are findings of the proposed project's impacts on the transportation system using the calibrated TDF model. The results are based on the project's vehicular and non-vehicular trip making characteristics, trip length, and its interaction with other surrounding/citywide land uses, and the City's transportation network.

The TDF model calculation results determined that the project's net capita is 686. The incremental VT per capita change is 3.5, which indicates that the project's incremental VT per capita change would exceed the adopted threshold of significance under the VT per capita of 2.8. Therefore, impacts related to VT would be potentially significant, before mitigation. (SCEA, p. 184)

The City's Department of Transportation has determined that by implementing the strategies under Mitigation Measure TRA-1, the project's VT impact would be reduced to a less than significant level. The proposed project would also be subject to mitigation measure MM-TRA-1(b) of SCAG's RTP/SCS EIR which would further reduce impacts.

g. Tribal Cultural Resources

i. Potential Significant Impacts Evaluated

- Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a 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:

- 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

- 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 Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe.

ii. Proposed Mitigation

MM-TCR-1: Native American Monitoring

During ground-disturbing activities, a monitor meeting the satisfaction of the Gabrieleño Band of Mission Indians—Kizh Nation shall be present. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if Native American artifacts are found, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the Project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report, including site record to the City and the South Central Coastal Information Center at California State University, Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report. Subsequently, the find shall be turned over to the tribe. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources as determined by the monitor. (SCEA, p. 199)

iii. Findings Pursuant to CEQA Guidelines Section 21155.2

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the SCEA.

iv. Supporting Explanation

Tribal cultural resources are defined in Public Resources Code 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either:

- Included or determined to be eligible for inclusion in the California Register of Historical Resources
- Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1

Based on the analysis contained in the Cultural Resources Technical Study, site surveys confirmed that no exposed surfaces were present and therefore the potential for encountering archaeological resources is low. Nevertheless, in the event that archaeological resources are discovered during construction of the project, particularly during excavation for the subterranean parking garage, impacts could be potentially significant. Therefore, Mitigation Measures CR-3, CR-4, and CR-6 are required if unanticipated cultural resources are discovered during grading and construction. Further, Mitigation Measure TCR-1, resulting from consultation with the Gabrieleno Band of Mission Indians – Kizh Nation tribe, would require use of a Native American monitor during ground disturbance. Implementation of these measures would reduce potential impacts to tribal cultural resources to a less than significant level. (SCEA, p. 198)

V. 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 SCEA that are applicable.

VI. 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.

VII. 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 final approval, as may be further modified by any conditions of approval imposed by the City Council.

Adopted at the _____ meeting of the City Council on the _____ day of

_____, 2018 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
Mark Jomsky, CMC
City Clerk

APPROVED AS TO FORM:

_____
Theresa E. Fuentes
Assistant City Attorney

Attachment #1

MITIGATION MONITORING AND REPORTING PROGRAM

3200 East Foothill Boulevard Mixed Use Project

Mitigation Monitoring and Reporting Program

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

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

June 2018

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

Mitigation Monitoring and Reporting Program

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

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

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

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