

RESOLUTION NO. \_\_\_\_\_

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA  
CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT (SCH NO.  
2011081076) FOR THE HUNTINGTON MEMORIAL HOSPITAL PROJECT,  
AND ADOPTING ENVIRONMENTAL FINDINGS AND A  
MITIGATION MONITORING AND REPORTING PROGRAM**

**WHEREAS**, the Huntington Memorial Hospital Project (the "Project") proposes new construction totaling approximately 217,300 square feet and demolition of existing buildings totaling 250,076 square feet. Additionally, the Project proposes amendments to the Master Plan to reflect the inclusion of existing buildings on the Hospital campus not yet formally included in the Plan boundary; and

**WHEREAS**, for the reasons set forth below, while the City will hereby certify the EIR, the City will not reject Refined Alternative 2, Reduced Patient Beds Alternative, and therefore sets forth herein detailed CEQA findings with regard to that Alternative; and

**WHEREAS**, Refined Alternative 2, Reduced Patient Beds Alternative proposes the same physical and operational component as Alternative 2, except that the design of the West Tower Annex would be modified, such that the originally planned single tower would be replaced with two buildings of fewer stories and reduced heights. However, under Refined Alternative 2, the proposed new West Tower Annex would be housed in two smaller buildings, West Annex A and West Annex B. The total square footage for the two buildings would be unchanged compared to the West Tower Annex proposed under the original project, totaling approximately 200,000 square feet. In contrast to the height of the West Tower Annex Building under the original project (six stories and 90 feet), the West Annex A building, the southernmost and taller of the two buildings, would be a maximum of three stories and 60 feet in height and the West Annex B building, the northernmost of the two buildings closer to California Boulevard, would be a maximum of two stories and 42 feet in height above adjacent grade. As under Alternative 2, Refined Alternative 2 would reduce the increase in new patient beds proposed under the original project to 17, for a total of 642 licensed patient beds overall and the majority of the new patient beds would be housed in the proposed new West Tower Annex.

While the two buildings would continue to be located in the northwestern corner of the campus, as would be the proposed West Tower Annex under the original

project, because two buildings are now proposed they would occupy a comparatively larger footprint and increased lot coverage.

Under Refined Alternative 2, West Annex Buildings A and B would be set back five feet from the (western) Pasadena Avenue property line, unchanged from the original project or Alternative 2. In contrast, where the West Tower Annex was proposed to be set back 55 feet from the (northern) California Boulevard property line, behind the former West Lawn/current construction laydown yard, under Refined Alternative 2 the closest building, West Annex B, would observe a reduced 10-foot setback from the California Boulevard property line, identical to that of the parking structure just to the east on the other side of the Hospital's Drexel Way driveway entrance. At-grade separations of approximately 49 feet would be maintained between proposed West Annex Buildings A and B, and between West Annex Building A and the existing West Tower, to allow landscaped gardens and pedestrian walkways that are visually and physically accessible from Pasadena Avenue.

The West Annex buildings would continue to be constructed as part of Phase V of the overall Master Plan Amendment Project, and the duration of Phase V construction would not change as compared to the original project. However, in light of the passage of time since the Draft EIR was prepared, the start date of construction for the original project, including Phase V, would occur later than was anticipated in the Draft EIR. Under the original project, construction was anticipated to commence in 2017 with buildout anticipated for 2032, and Phase V construction was anticipated to take place between 2024 and 2026. Under Refined Alternative 2, construction would commence in 2018 and the 2032 buildout date would remain with buildout anticipated for 2032, but Phase V construction would commence in 2025 and end in 2027. Phase V would still include demolition of the existing construction management buildings currently occupying the 0.61-acre parcel at 620-624 S. Pasadena Avenue, on the site of the proposed West Annex buildings, as well as construction of the new West Annex buildings.

The reduction in total patient beds from 690 to 642, elimination of a single West Tower Annex building and replacement with two reduced-height buildings, and associated changes in construction timing and activities, represent the only changes as compared to the original project or Alternative 2. All other characteristics of the original project as set forth in the Draft EIR, including project characteristics (new construction, demolition, and improvements) within each proposed construction phase and amendment of the Master Plan boundaries, the BGSF cap, vehicle access and circulation, open space and

landscaping (with the exception of the reduced California Boulevard setback as noted above), lighting and security features, and all proposed entitlements sought, would remain unchanged; and

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

**WHEREAS**, pursuant to CEQA Guidelines Section 15063, the City prepared an Initial Environmental Study (the "Initial Study") for the project (see Appendix A of the Draft EIR). The Initial Study concluded that there was substantial evidence that the project might have a significant environmental impact on the following resource areas: (1) Aesthetics, (2) Air Quality, (3) Greenhouse Gas Emissions, (4) Noise, and (5) Traffic; and

**WHEREAS**, pursuant to CEQA Guidelines Sections 15064 and 15081, and based upon the information in the Initial Study, the City ordered the preparation of an environmental impact report ("EIR") for the project. On August 19, 2011, the City prepared and sent a Notice of Preparation (NOP) of the Draft EIR and a copy of the Initial Study to responsible, trustee, and other interested agencies and persons in accordance with CEQA Guidelines Sections 15082(a) and 15375; and

**WHEREAS**, pursuant to CEQA Guidelines Section 15082, the City solicited comments from potential responsible and trustee agencies for a 30-day period, from August 19, 2011 to September 19, 2011, requesting details about the scope and content of the environmental information related to the responsible agency's area of statutory responsibility that should be studied in the EIR, as well as the significant environmental issues, reasonable alternatives and mitigation measures that the responsible agency would have analyzed in the Draft EIR. Two public scoping meetings were held on September 1, 2011 and September 14, 2011 to determine the scope and content of the environmental information to be included in the Draft EIR. Comments received during the scoping period are contained in Appendix A of the Draft EIR; and

**WHEREAS**, pursuant to Public Resources Code section 21092, the City provided a public Notice of Completion and Availability ("NOA") of the Draft EIR (State Clearinghouse No. 2011081076) on January 5, 2016 through mailing to all property owners within 500 feet of the project. The NOA also gave notice of a public hearing before the City Planning Commission on January 27, 2016 at

which comments on the Draft EIR would be taken. Copies of the Draft EIR were also placed at the City's Planning and Development Department at 175 North Garfield Avenue, at the Central Library at 285 East Walnut Street; and on the City's website; and

**WHEREAS**, the Draft EIR was circulated, together with technical appendices, to the public and other interested persons for a 60-day public comment period, from January 5, 2016 to February 19, 2016. During the comment period, the City held a duly noticed public hearing before the City Planning Commission on January 27, 2016, respectively, at which the public was given the opportunity to provide comments on the Draft EIR; and

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

**WHEREAS**, the City subsequently prepared written responses to all written comments received on the Draft EIR and made revisions to the Draft EIR, as appropriate, in response to those comments. The City initially distributed written responses to comments on the Draft EIR on December 2, 2016, in accordance with the provisions of Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088. The written responses to comments were also made available for a 10-day period of public review before the commencement of the public hearings regarding the certification of the Final EIR. After reviewing the responses to comments and the revisions to the Draft EIR and hearing oral comments, the City Planning Commission directed the Applicant (Huntington Memorial Hospital) to meet with neighboring residents to address and resolve their comments on the Draft EIR concerning the massing and height of the proposed West Tower Annex building before the City Planning Commission made a recommendation concerning the project or alternatives; and

**WHEREAS**, the EIR is comprised of the Draft EIR including clarifications, revisions, and corrections thereto; and the comments and responses to comments on the Draft EIR set forth in the Final EIR dated December 2, 2016; and the comments and responses to comments on the Draft EIR set forth in the January 2017 Final EIR, set forth in the Revised Final EIR dated February 2018; and

**WHEREAS**, the City Planning Commission held a duly noticed public hearing on the Final EIR and the Project on December 14, 2016 to consider

making a recommendation to the City Council regarding (1) certification of the Final EIR and Mitigation Monitoring and Reporting Program, (2) approval of Conditional Use Permits, Minor Conditional Use Permits, and variances for the project; and (4) approval of the original project or Alternative 2, Reduced Patient Beds Alternative, with specified conditions of approval; and

**WHEREAS**, at the public hearing on December 14, 2016, the City Planning Commission, in concurrence with City staff's recommendation, considered the proposed project and ultimately recommended that the Applicant meet with concerned residents in the neighborhood abutting Huntington Memorial Hospital regarding their comments on the proposed mass and height of the West Tower Annex component of the proposed project, and consider modification of the project and alternatives to address the concerns raised; and

**WHEREAS**, the Applicant has since met with neighboring residents and, as a result, has refined the original Alternative 2, Reduced Patient Beds Alternative, as evaluated in the Draft EIR, and has submitted a revised Final EIR containing a description and analysis of the refined Refined Alternative 2; and

**WHEREAS**, the City Council held a second duly noticed public hearing on the Final EIR and the project on March 26, 2018; and

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

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

**WHEREAS**, the City Council, as the decision-making body for the lead agency with regard to this project, has independently reviewed and considered

the contents of the Final EIR and all documents and testimony in the record of proceedings prior to deciding whether to certify the Final EIR; and

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

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF PASADENA RESOLVES AS FOLLOWS:**

**I. RESOLUTION REGARDING CERTIFICATION OF THE EIR**

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

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

**II. RESOLUTION REGARDING ENVIRONMENTAL IMPACTS NOT ANALYZED IN THE EIR**

The City Council hereby finds that the following potential environmental impacts of the project were found to be less than significant in the Initial Study, did not require the imposition of mitigation measures, and therefore did not require study in the EIR: (1) Agricultural and Forest Resources, (2) Biological Resources, (3) Cultural Resources, (4) Energy, (5) Geology and Soils, (6) Hazards and Hazardous Materials, (7) Hydrology and Water Quality, (8) Land Use and Planning, (9) Mineral Resources, (10) Population and Housing, (11) Public Services, (12) Recreation, and (14) Utilities and Service Systems (see Initial Study, Appendix A of the Draft EIR).

### **III. RESOLUTION REGARDING ENVIRONMENTAL IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT WITHOUT MITIGATION**

As set forth above, while the City will hereby certify the EIR, the City will not reject Refined Alternative 2, Reduced Patient Beds Alternative, and therefore sets forth herein detailed CEQA findings with regard to that Alternative. The City Council finds that Refined Alternative 2 will have no impact or a less than significant impact without mitigation on each of the topics evaluated in the EIR. For some of these topics, compliance with applicable regulatory requirements is assumed, as discussed in the EIR, which would ensure that impacts remain less than significant. Environmental topics determined to be less than significant without mitigation are listed below. For each topic, the discussion begins with a delineation of the potential impacts evaluated in the EIR, as specifically related to that topic, along with page citations as to where in the EIR the relevant discussion is found, and is followed by an explanation of the substantial evidence in support of the EIR conclusion that a significant impact would not occur.

#### **a. AESTHETICS**

##### **i. Potential Impacts Evaluated**

- Would the project have a substantial adverse effect on a scenic vista? (Draft EIR, p.4.A-25)
- Would the project substantially degrade the existing visual character or quality of the site and its surroundings? (Draft EIR, p.4.A-31)
- Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Draft EIR, p.4.A-32)
- Would the project shade shadow-sensitive uses more than three consecutive hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time during the low-sun period (e.g., Winter solstice), or more than four consecutive hours between 9:00 a.m. and 4:00 p.m. for other times of the year? (Draft EIR, p.4.A-33)

##### **ii. Proposed Mitigation – None Required**

### **iii. Findings Pursuant to CEQA Guidelines Section 15091**

As noted above and explained below, the EIR analysis determined that implementation of the Refined Alternative 2 would not result in significant impacts related to aesthetics. Where topical analysis and impact determinations for Refined Alternative 2, as provided in the Final EIR, did not differ from analysis provided for the original project in the Draft EIR, this is stated and the impact determinations in the Draft EIR and associated page numbers are cited.

### **iv. Supporting Explanation**

Under Refined Alternative 2, as under the original project, temporary construction activities would be visible to adjacent land uses including residences west of the project site on Pasadena Avenue and commercial and residential homes north of the project site on East California Boulevard. Construction activities would also be visible to pedestrians and motorists on Fair Oaks Avenue, California Boulevard, and Pasadena Avenue. Views of construction activity would be more limited on Bellefontaine Street since new improvements would not occur on the southern perimeter of the site. However, as indicated in PDF-AES-1, temporary construction fencing would be installed around all active construction sites to visually screen on-site activities from street-level views and to secure the construction site. These temporary changes are not anticipated to result in substantial alteration to the valued visual character of the project site or area, nor would they degrade scenic views. Construction-related aesthetic impacts to scenic vistas would be less than significant. (Draft EIR, pp. 4.A-25)

Scenic vistas of the San Gabriel Mountains to the north are available from the project vicinity. Under Refined Alternative 2, the proposed new West Tower Annex would be housed in two smaller buildings, West Annex A and West Annex B. The total square footage for the two buildings would be unchanged compared to the West Tower Annex proposed under the original project and Alternative 2, each building would contain approximately 100,000 square feet. In contrast to the height of the West Tower Annex Building under the original project and Alternative 2 (six stories and 90 feet), the West Annex A building, the southernmost and taller of the two buildings, would be a maximum of three stories and 60 feet in height and the West Annex B building, the northernmost of the two buildings closer to California Boulevard, would be a maximum of two stories and 42 feet in height above adjacent grade. (Final EIR pp. 3-12 through 3-13)

Since northeastern views of the San Gabriel Mountains from Pasadena Avenue are already partially obstructed by the West Tower, other Hospital buildings and landscaping, since limited northeastern views would still be available from across the West Lawn, and because under Refined Alternative 2, the proposed new West Tower Annex would be housed in two smaller buildings, West Annex A and West Annex B, the addition of the West Tower Annex would not significantly obstruct views of the mountains from residential and other vantage points of the Hospital campus. Furthermore, the West Tower Annex would not impact direct northern views of the San Gabriel Mountains from Pasadena Avenue.

No existing scenic views of the San Gabriel Mountains, looking north across the project site, are available from Bellefontaine Street to the south. Direct northern views of the San Gabriel Mountains from Fair Oaks Avenue would also not be impacted. Therefore, impacts to a scenic vista from the south and east looking north and northwest would be less than significant.

As under the original project, on the east side of the project site, the proposed development of the at-grade landscaped pedestrian corridor between Fair Oaks Avenue and the landscaped open space at the center of the Hospital campus would be constructed in an area developed with surface parking and parking structures. The pedestrian corridor would be landscaped with mature trees, low-profile plants, and lawn, and because of its low profile, would not alter direct northern views of the San Gabriel Mountains from Fair Oaks Avenue. No other scenic vistas are located in this area. Therefore, impacts to a scenic vista from the southeast and east looking north and northwest would be less than significant. (Draft EIR, pp. 4.A-25 through 4.A-31)

Under Refined Alternative 2, the West Tower Annex buildings West Annex A and West Annex B, would be similar in design, scale, and height to the adjacent West Tower, East Tower, and East Tower Annex. The two buildings proposed under Refined Alternative 2 would occupy a larger collective building footprint (i.e., increased lot coverage) than the taller West Tower Annex building proposed under the original project. As previously noted, the southernmost of the two buildings, West Annex A, would occupy approximately the same footprint as the taller West Tower Annex building under the original project and original Alternative 2, but would be two-thirds the height of that building. The northernmost of the two buildings, West Annex B, would be located north of West Annex A and closer to California Boulevard. Although it would be lower in height above grade, at two stories and 42 feet, it would encroach northward into the former West Lawn setback as depicted in the Master Plan for the original project.

This area has served as a construction laydown yard for projects on the Hospital campus for a number of years, and is proposed to remain in that use until Phase V redevelops this portion of the campus. The setbacks from the Pasadena Avenue property line (5 feet) would remain unchanged as compared to the original project and Alternative 2, whereas the setback from the California Boulevard property line would be reduced from 55 feet to 10 feet. This matches the setback for the parking structure immediately east of the Hospital's Drexel Way entrance driveway. Moreover, the former West Lawn in the northwest corner of the Hospital campus has served as a fenced, visually inaccessible construction laydown yard for a number of years. Finally, under Refined Alternative 2, 49-foot at-grade separations would be maintained between West Annex Buildings A and B and between West Annex Build A and the existing West Tower, and these areas would be landscaped with gardens and pedestrian walkways that are visually and physically accessible from Pasadena Avenue (Final EIR, p. 3-13)

As noted in Project Design Feature PDF-AES-2 for the original project, the architectural style of the West Annex A and B buildings would be compatible with that of the existing East Tower, East Tower Annex, and West Tower. As proposed for the West Tower Annex building under the original project, the two reduced-height Annex buildings would be constructed in the Mediterranean Revival style to present a cohesive appearance for the campus, with tile roofs and other appropriate architectural decoration. Additionally, as noted in Project Design Feature PDF-AES-4 for the original project, Landscaping would be introduced with the new buildings, including along the California Boulevard and Pasadena Avenue edges of the Hospital campus, which would partially visually screen the buildings from view by pedestrians, motorists, residential uses to the west, and other off-site uses to the north and west. At the same time, at-grade 49-foot separations between the new West Annex Buildings and between West Annex Building A and the existing West Tower would be landscaped and provide visual and pedestrian access into the campus from Pasadena Avenue.

For the above reasons, the introduction of the West Annex A and B buildings would not introduce components that would degrade the existing visual character or quality of the Hospital campus or its surroundings, and impacts on these resources would be less than significant. Moreover, despite the increased lot coverage and the location of West Annex B closer to California Avenue, the reduced heights of the West Annex buildings would render them less visually prominent from the residential uses to the west and from vantages to the north, as well as to motorists and pedestrians on surrounding roadways, compared to the original project and Alternative 2. (Final EIR p. 3-14)

As under the original project, the La Viña Building Addition would involve the construction of additional square feet to the first and second floor to the southern end of the La Viña Building. The new addition would not increase the height of the existing building. As such, while portions of the addition would be visible from Pasadena Avenue, the La Viña Building would remain relatively low in profile and would largely not be visible from California Boulevard, Bellefontaine Street, or Fair Oaks Avenue. The La Viña Building Addition would be designed to blend with and visually complement the original La Viña Building. As such, the La Viña Building Addition would not introduce a new land use or visual element that would vary greatly from the current visual appearance of the Hospital campus, and impacts on visual character or quality would be less than significant.

As under the original project, under Refined Alternative 2 the area cleared by the demolition of the 1921 Building, the 1938 Building, and the Valentine Building would be converted and landscaped to create the landscaped open space area. While demolition of these buildings would change the visual character of the campus interior and alter the partial views of these buildings from Pasadena Avenue, Bellefontaine Street and California Boulevard, these buildings are not considered historic resources, iconic structures, or unique visual resources. The landscaped open space is proposed to include terraces and gatherings areas, a rose garden, children's garden, a fountain/water feature, and extensive pedestrian walkways. Landscaping would include a mix of trees, shrubs, ground cover, selected to provide varied textures and colors. As such, while the demolition of the three existing buildings and the creation of the landscaped open space would alter the visual character of the project site, the creation of the landscaped open space would not introduce components that would detract from the visual quality of the Hospital campus. For these reasons, the impacts of Refined Alternative 2 would be similar to the project's impacts on the visual character or visual quality of the project site and surroundings (Draft EIR, pp. 4.A-31 through 4.A-32) and would be less than significant.

As under the original project, Refined Alternative 2 would introduce new interior building lighting and exterior lighting. New outdoor lighting would include pedestrian safety lighting and new streetlights, as required by the City of Pasadena Public Works Department. New and modified lighting associated with Refined Alternative 2 would serve to enhance the security of the site as well as the safe operation of the facility. New and updated lighting would be directed downward away from adjoining properties and public rights of way. In-fill pedestrian lights would be installed along or near the Fair Oaks Avenue frontage

and the proposed new internal pedestrian corridor. Pedestrian safety lighting already exists at the existing crosswalk across Fair Oaks Avenue linking the Hospital campus to the Gold Line Fillmore Station to the east, and no additional pedestrian safety lighting would be added at this location. All proposed outdoor lighting would be required to comply with the standards in the Zoning Code (Section 17.040.080, Outdoor Lighting), that regulate glare and outdoor lighting. Therefore, impacts attributable to project-induced artificial lighting would be less than significant.

Use of materials would conform to Zoning Code requirements and evaluations of exterior cladding and materials are required through the City's design review process. Overall, as under the original project (Draft EIR, pp. 4.A-32 through 4.A-33), the Refined Alternative would not create a substantial new source of glare that would adversely affect day or nighttime views in the area and impacts would be less than significant.

As under the original project, shadows under Refined Alternative 2 would shade any single off-site use on the west side of Pasadena Avenue for one hour or less during the morning, and therefore would fall well under the three-hour threshold. Under the original project, at 12:00 p.m., project shadows generated by the West Tower Annex would fall to the north of the project site, and, because of the sun's position overhead, would not extend beyond the Hospital campus boundary. During the afternoon hours (e.g., 12:00 p.m. to 3:00 p.m.), the shadow bearing would be to the northeast of the project site and also would not extend outside of the project site boundary. Between the hours of 9:00 a.m. and 3:00 p.m., the building would not cast shadows on the single-family homes to the north, Waverly Community Gardens, residences to west, or convalescent homes to the south of the project site. The original project would result in less than significant shade/shadow impacts during the winter solstice. As discussed previously, winter solstice represents the period of greatest potential for off-site shading impacts because winter shadows are the longest shadows of the year at this latitude (e.g., provide a worst-case scenario. The original project resulted in less than significant impacts regarding shade and shadow (Draft EIR, pp. 4.A-33 through 4.A-34).

Since Refined Alternative 2 proposes two buildings that are considerably reduced in height (by 33 percent and 53 percent, respectively) compared to the West Tower Annex under the original project and Alternative 2, shadow impacts under

Refined Alternative 2 would remain less than significant, and would be reduced compared to the original project. (Final EIR pp. 3-14 through 3-15)

### Cumulative Impacts

As under the original project, the development of these related projects may result in the removal or change in context of architecturally or historically important buildings. However, because the project would not cause any historically or architecturally important structures to be altered or removed, or introduce any features that would detract from the existing visual character, it would not contribute to cumulatively significant aesthetic impacts associated with the potential alteration or removal of valued aesthetic resources. It is anticipated that these related projects have been, or would be, constructed in a manner acceptable to the City's Design Commission and other decision-making bodies and would not individually or cumulatively cause the existing visual character of the area to be substantially altered or degraded. Therefore, the cumulative impact of the related projects, combined with the project, would be less than significant with respect to aesthetic character.

Taller elements of the related projects have the potential to block views from public streets and other vantage points, around the project vicinity. However, no scenic views of the San Gabriel Mountains through the Fair Oaks Avenue and Pasadena Avenue corridors would be blocked. As discussed earlier, the only designated state scenic highway in the City of Pasadena is the Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the extreme northwest portion of the City. The project site is not within the viewshed of the Angeles Crest Highway, and not along any scenic roadway corridors identified in the City of Pasadena General Plan. As viewed from private locations, the project and related projects in close proximity to the Hospital campus are sufficiently distant from each other so as not to directly block views in a cumulative manner.

It is anticipated that the related projects located near the Hospital campus could contribute to an increase in ambient light in the area. However, the related projects would be developed within an existing urban environment already characterized by commercial, residential, hospital, and office uses and relatively high nighttime illumination levels and are not expected to significantly increase illuminated signage, vehicle traffic or light and glare associated with traffic headlights. The project's potential glare impacts would be eliminated through the implementation of project design features and the design review process. Buildout of the Master Plan Amendment Project, considered together with the

related projects, would have a less than cumulatively considerable contribution to cumulatively significant glare impacts.

Shade/shadow impacts are typically confined to a project site's immediate surroundings, and the majority of the related projects are too far from the project site to result in cumulative shade/shadow impacts in the vicinity of the Hospital campus. Therefore, cumulative shade impacts were determined to be less than significant for the original project (Draft EIR, pp. 4.A-34 through 4.A-40) and would also be less than significant for Refined Alternative 2.

## **b. AIR QUALITY**

### **i. Potential Impacts Evaluated**

- Would the project conflict with or obstruct implementation of the applicable air quality plan? (Draft EIR, p. 4.B-28)
- Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Draft EIR, p. 4.B-28)
- Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? (Draft EIR, p. 4.B-28)
- Would the project expose sensitive receptors to substantial pollutant concentrations? (Draft EIR, p. 4.B-28)
- Would the project create objectionable odors affecting a substantial number of people? (Draft EIR, p. 4.B-28)

### **ii. Proposed Mitigation – None Required**

### **iii. Findings Pursuant to CEQA Guidelines Section 15091**

As noted above and explained below, the EIR analysis determined that implementation of Refined Alternative 2 would not result in significant impacts related to air quality. Where topical analysis and impact determinations for Refined Alternative 2, as provided in the Final EIR, did not differ from analysis

provided for the original project in the Draft EIR, this is stated and the impact determinations in the Draft EIR and associated page numbers are cited.

#### **iv. Supporting Explanation**

Under the original project, the AQMP was prepared, assuming a region-specific level of growth, to reduce the high levels of pollutants within areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact of reduced air quality on the economy. Implementation of the Huntington Memorial Hospital Master Plan Amendment Project would result in decreased daily maximum emissions of ozone precursors VOC and NO<sub>x</sub> and non-attainment pollutants PM<sub>10</sub> and PM<sub>2.5</sub>, as compared to existing operations. Consistency with the implementation of the AQMP and applicable air quality plans would be ensured or enhanced through compliance with the applicable SCAQMD regulations, programs, and policies. (Draft EIR, pp. 4.B-32)

Under the original project, emissions from construction of the original project are not predicted to exceed any applicable SCAQMD regional or local impact threshold and therefore, are not expected to result in ground level concentrations that exceed the NAAQS or CAAQS. While construction phasing would be modified slightly under Refined Alternative 2, similar to the original project, as for the original project (Draft EIR, pp. 4.B-37), Refined Alternative 2 would not result in a cumulatively considerable net increase for non-attainment pollutants or ozone precursors and would result in a less than significant impact for construction emissions.

Under the original project, long-term project operations are not expected to create any objectionable odors that could affect nearby sensitive receptors. Similarly, Refined Alternative 2 does not include any uses identified by the SCAQMD as being typically associated with objectionable or nuisance odors. Garbage collection areas for the project would be covered and situated away from the property line and sensitive off-site uses. Medical waste would be properly sealed and stored in accordance with SCAQMD rules to ensure that no objectionable medical waste-related odors would be created. Good housekeeping practices would be sufficient to prevent nuisance odors. Potential odor impacts would be less than significant for the original project (Draft EIR, pp. 4.B-41) and would also be less than significant for Refined Alternative 2.

### Cumulative Impacts

As under the original project, because the original project does not cause significant regional or localized impacts, the project's incremental contribution of construction emissions would not be cumulatively considerable. Since emissions would be transient in intensity, duration, and location, it is unlikely that a single receptor would be consistently (long-term) exposed to high levels of TACs during project construction. As a result, exposure to construction emissions is not considered a significant impact. Moreover, the project's incremental contribution of construction-phase TAC emissions, considered together with those of the related projects, would not be cumulatively considerable. With mandatory compliance with SCAQMD Rules, it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. Thus, the project's incremental odor impacts, considered together with those of the related projects, would not be cumulatively considerable. (Draft EIR, pp. 4.B-42 through pp. 4.B-43)

For operations, the project does not exceed the regional or local SCAQMD thresholds for operation. Therefore, operation would not result in a cumulatively considerable net increase of criteria pollutants for which the project is in non-attainment. Because the project's operational emissions do not cause significant impacts beyond the project boundary, pursuant to CEQA Guidelines Section 15064(h)(1), the project's operational emissions would not overlap with emissions from related projects, and therefore would not be cumulatively considerable. This would be unchanged under Refined Alternative 2 and impacts would remain less than significant.

Since the project is not part of an ongoing regulatory program, the SCAQMD recommendations are for project-specific air quality impacts to be used to determine the potential cumulative impacts to regional air quality. Therefore, in lieu of analyzing the additive effects of related projects, thresholds for operational emissions were considered in the context of cumulative impacts analysis, as SCAQMD recommends for all projects under CEQA. As noted above, the project would not result in long-term emissions in excess of the applicable regional and local SCAQMD thresholds, and in accordance with SCAQMD guidance, the incremental emissions from project operation would not be cumulatively considerable. This would be unchanged under Refined Alternative 2 and impacts would remain less than significant.

With respect to emissions of TACs, the project would not represent a substantial source. Based on recommended screening-level siting distances for TAC sources, as set forth in the CARB Handbook, the project's incremental contribution to cumulative impacts, considered together with the related projects, would not be cumulatively considerable.<sup>1</sup> Neither the project nor any of the identified related projects would represent substantial sources of long-term TAC emissions. However, the project and related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, among other things. Pursuant to the law enacted in 1983 by California Assembly Bill 1807 (Tanner, Stats. 1983, ch. 1047), as amended, which directs the CARB to identify substances such as TAC and adopt ATCMs to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted, and will continue to result, in substantial Basin-wide TAC emissions reductions. Therefore, TAC emissions during long-term operations, considered together with the related projects, would not be cumulatively considerable. This would be unchanged under Refined Alternative 2 and cumulative impacts would remain less than significant.

With respect to potential odor impacts, neither the project, which will utilize BACT technology, nor any of the related projects (which are primarily institutional, general office, residential, retail, and restaurant uses) have a high potential to generate odor impacts. Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement BACT to limit potential objectionable odor impacts to a less than significant level. Thus, the potential incremental odor impacts of related projects are anticipated to be less than significant, and the incremental contributions of the project plus those of the related projects are not anticipated to be cumulatively considerable. (Draft EIR, pp. 4.B-42 through pp. 4.B-45) This would be unchanged under Refined Alternative 2 and cumulative impacts would remain less than significant.

### **c. GREENHOUSE GAS EMISSIONS**

#### **i. Potential Impacts Evaluated**

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Draft EIR, p. 4.C-20)

---

<sup>1</sup> *California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, (April 2005).*

- Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? (Draft EIR, p. 4.C-20)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 15091**

As noted above and explained below, the EIR analysis determined that implementation of Refined Alternative 2 would not result in significant impacts related to the greenhouse gas emissions listed above. Where topical analysis and impact determinations for Refined Alternative 2, as provided in the Final EIR, did not differ from analysis provided for the original project in the Draft EIR, this is stated and the impact determinations in the Draft EIR and associated page numbers are cited.

**iv. Supporting Explanation**

As under the original project, the project at interim build-out would result in a net increase in GHG emissions relative to existing conditions of approximately 402 MTCO<sub>2e</sub>. At full build-out, the project would result in a net decrease in GHG emissions relative to existing conditions of approximately 2,939 MTCO<sub>2e</sub>, inclusive of amortized project construction emissions. The net change in annual GHG emissions would not result in an exceedance of the SCAQMD screening threshold of 3,000 MTCO<sub>2e</sub> per year and impacts would be less than significant.

The project would result in a net decrease in GHG emissions due to the decrease in square footage compared to the existing site and from an increasing percentage of the vehicle fleet mix meeting more stringent vehicle emission standards. The reduction in square footage would result in a reduction in energy required for heating and cooling. Implementation of the 33 percent renewable energy standards (i.e., RPS) would further reduce future year emissions as would implementation of the 2017-2025 motor vehicle emissions standards (the project would not conflict with implementation of these standards). Although the project would contribute to an increase in daily trips, the fleet-wide fuel economy improvements as well as the reduction in square footage and energy usage would result in a net decrease in GHG emissions at full build-out (a small, temporary increase would result at interim build-out).

Greenhouse gas emissions presented above were calculated for operational year 2030 (CalEEMod only allows the selection of operational years in 5-year increments after 2025), which takes into account improvements in

vehicle efficiency and gas mileage which in turn results in lower GHG emissions. However, certain mobile source GHG reduction measures are not accounted for in the CalEEMod model such as the model year 2017 through 2025 passenger cars and light-duty trucks emissions standards. In addition, energy GHG calculations do not account for increased efficiency due to improved power generation technology, increased renewable energy sources, and future changes to the Title 24 building energy efficiency standards. Therefore, GHG emission reductions are conservative and represent a worst-case scenario. (Draft EIR, pp. 4.C-21 through pp. 4.C-24)

As under the original project, Refined Alternative 2 would improve the energy efficiency of the on-site uses by modernizing, renovating, and replacing older buildings with newer facilities that would meet more stringent energy efficiency standards thereby reducing emissions from energy usage (i.e., natural gas and electricity). This is consistent with the AB 32 Scoping Plan, which calls for “solutions to achieve efficiency upgrades in existing buildings.”<sup>2</sup> The Scoping Plan also recognizes that “major renovations and sustainable operation of existing buildings offer the greatest potential to reduce building-related GHG emissions.”<sup>3</sup> As shown in Table 4.C-5, the project would be generally consistent with the Scoping Plan, and thus AB 32, by resulting in a net reduction of GHG emissions despite the increase in the number of beds and vehicle trips to the site. Therefore, the project has a less than significant impact with respect to GHG-reducing plans, policies, and regulations. (Draft EIR, p. 4.C-24)

### Cumulative Impacts

Under the original project, according to the California Air Pollution Control Officers Association’s (CAPCOA) CEQA and Climate Change White Paper, “GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.”<sup>4</sup> Thus, unlike the cumulative analyses for many impact areas that address the combined impacts of a proposed project in addition to related projects in a project area, global climate change analysis is inherently a cumulative impact analysis is not specifically dependent on GHG emissions from proximate development activity because of the complex physical, chemical and atmospheric mechanisms involved in global climate change. As discussed previously, the project would improve the energy efficiency of the on-site uses and would be located in an infill area with close access to off-site destinations and public transit stops. The

---

<sup>2</sup> California Air Resources Board, *First Update to the Climate Change Scoping Plan*, (2014).

<sup>3</sup> *Ibid.*

<sup>4</sup> California Air Pollution Control Officers Association, *CEQA and Climate Change*, (2008).

project would be generally consistent with GHG reduction strategies and measures under in AB 32. Therefore, the project would result in a less than significant contribution to cumulatively significant GHG emissions (Draft EIR, p. 4.C-25) and impacts under Refined Alternative 2 would be comparable.

#### **d. NOISE AND VIBRATION**

##### **i. Potential Impacts Evaluated**

- Would construction-related noise levels exceed 85 dBA when measured at a radius of 100 feet of such equipment? Would the project cause result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (Draft EIR, p. 4.D-16)
- Would construction activities occur outside the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday day, from 8:00 a.m. to 5:00 p.m. on Saturday, or anytime on Sunday or holidays (City-observed)? (Draft EIR, p. 4.D-16)
- Would project construction activities cause ground-borne vibration levels to exceed 0.5 inches per second (PPV) at the nearest residential building and 0.2 inches per second (PPV) at the nearest historic building? (Draft EIR, p. 4.D-19)
- Would project-related operational activities cause ambient noise levels to increase by 5 dBA or more at noise sensitive receptor locations? (Draft EIR, p. 4.D-20)
- Would project-related traffic increases ambient noise levels along roadway segments with sensitive receptors by 3 dBA (CNEL) or more resulting in a change in the noise compatible land use classification or by 5 dBA (CNEL) or more if project operations do not degrade community noise levels beyond the "conditionally acceptable" category? (Draft EIR, p. 4.D-22)
- Project construction and operation activities cause ground-borne vibration levels to exceed 0.04-inch-per-second PPV for human annoyance at nearby residential uses. (Draft EIR, p. 4.D-25)

## **ii. Proposed Mitigation – None Required**

## **iii. Findings Pursuant to CEQA Guidelines Section 15091**

As noted above and explained below, the EIR analysis determined that implementation of Refined Alternative 2 would not result in significant impacts related to the noise impact listed above. Where topical analysis and impact determinations for Refined Alternative 2, as provided in the Final EIR, did not differ from analysis provided for the original project in the Draft EIR, this is stated and the impact determinations in the Draft EIR and associated page numbers are cited.

## **iv. Supporting Explanation**

Under the original project, the estimated construction-related noise levels at 100 feet from the construction sites would not exceed the significance threshold. Off-site sensitive receptors would be exposed to construction noise levels of up to 52 dBA at R2, 81 dBA at R3, and 59 dBA at R4, which would not exceed the significance threshold of 85 dBA. Construction would be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 5:00 p.m. on Saturdays. As such, construction is expected to comply with City ordinances. Therefore, construction noise impacts would be less than significant. (Draft EIR, pp. 4.D-16 through 4.D-19). Impacts under Refined Alternative 2 would be comparable.

Under the original project, the project would generate ground-borne vibration during site clearing and grading activities with a large bulldozer in operation. Vibration velocities from the operation of construction equipment would range from approximately 0.003 to 0.089 inches per second PPV at 25 feet from the source of activity. The nearest off-site residential buildings, approximately 85 feet to the north, would be exposed to vibration velocities that range from approximately 0.0005 to 0.0142 inches per second PPV. As this value would not exceed the 0.5 inches per second PPV significance threshold, vibration impacts on these buildings would be less than significant. (Draft EIR, pp. 4.D-19 through 4.D-20). Impacts under Refined Alternative 2 would be comparable.

Under the original project, an evaluation of noise from all project sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum project-related noise level increase that could occur at the noise-sensitive receptor locations evaluates in this analysis. The only noise-

sensitive locations where composite noise impacts would be expected to occur are the single-family residences along Pasadena Avenue, west of the Hospital, because of proximity to project site. All other off-site noise-sensitive receptors are sufficiently distant from future on-site noise sources to be affected, or would be sufficiently shielded by project buildings and would avoid being affected. Impacts under Refined Alternative 2 would be comparable.

The project's loading dock area and refuse collection areas would be sited relatively distant from the existing single-family residential uses on Pasadena Avenue and would not have any unobstructed openings that face toward noise-sensitive receptor locations; noise associated with the loading docks and refuse collection would therefore not increase the overall ambient noise levels at this receptor or any other sensitive receptors. Noise associated with the operation of on-site outdoor mechanical equipment is expected to be a minimum of 10 dBA below the existing ambient noise levels, which would contribute less than 1.0 dBA to the composite noise level. Finally, noise generated by on-site parking facility use is not expected to exceed the ambient noise threshold at the single-family residential uses on Pasadena Avenue. For these reasons, the project's composite noise level impacts at off-site sensitive receptors would be less than significant (Draft EIR, pp. 4.D-20 through 4.D-22). Impacts under Refined Alternative 2 would be comparable.

Under the original project, the maximum increase in project-related traffic noise levels would be 0.3 dBA along Bellefontaine Street between St. John Avenue and Pasadena Avenue. The estimated noise increase due to project-related traffic is considered negligible and well below the 3 dBA CNEL significance threshold. Therefore, roadway noise level increases would be less than significant (Draft EIR, pp. 4.D-22 through 4.D-24). Impacts under Refined Alternative 2 would be comparable.

Under the original project, the nearest off-site residential structures are the single and multi-family residential buildings located approximately 80 feet west of the construction site, which would be exposed to vibration velocities ranging approximately from 0.006 to 0.016 inches per second PPV. As these values are below the 0.04 inches per second PPV perception threshold and would not be perceptible. Therefore, vibration impacts during construction would be less than significant. Impacts under Refined Alternative 2 would be comparable.

The project would include typical commercial-grade stationary mechanical and electrical equipment such as air handling units, condenser units, and

exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed subterranean parking facility, on-site refuse/delivery truck activity, and on-site loading dock/refuse collection area activity. Ground-borne vibration generated by each of the above-mentioned activities would be similar to the existing sources (i.e., traffic on adjacent roadways) adjacent to the project site. According to the Caltrans' Transportation- and Construction-Induced Vibration Guidance Manual, the maximum highway truck traffic vibration level is 0.035 inches per second PPV at 50 feet from Freeways. The potential vibration impacts from all project sources at 80 feet (the closest distance to off-site structure locations) would be 0.0173 inches per second PPV, less than the significance threshold of 0.04 inches per second PPV for perceptibility. As such, vibration impacts associated with operation of the project would be below the significance threshold and vibration impacts during operation would be less than significant (Draft EIR, p. 4.D-25). Impacts under Refined Alternative 2 would be comparable.

#### Cumulative Impacts

Under the original project, if overlapping construction activities with the project were to occur, there could be cumulative noise impacts on sensitive receptors. Construction noise levels would be intermittent, temporary and would comply with time restrictions and other relevant provisions in the City of Pasadena Municipal Code (PMC). Therefore, project contribution to construction noise levels would be less than significant and not cumulatively considerable since project-related construction noise at receptors would be below significance threshold. Impacts under Refined Alternative 2 would be comparable.

Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from "existing conditions" to "future with project" conditions (which includes traffic volumes from future ambient growth, known related projects, and the project) to the applicable significance criteria. Cumulative traffic volumes would result in a maximum increase of 2.1 dBA CNEL along the segment of California Boulevard, between Orange Grove Boulevard and St. John Avenue and Orange Grove Boulevard, north of California Boulevard, although the project's contribution to the cumulative increase would be less than 0.2 dBA. The cumulative noise increase at all other analyzed roadway segments would be less than 2.1 dBA CNEL. As the noise level increase would be below the 3-dBA CNEL significance threshold, the project's contribution to this increase would not be cumulatively considerable

and roadway noise impacts due to cumulative traffic volumes would be less than significant.

Due to PMC provisions that limit noise emission from stationary-noise sources such as roof-top mechanical equipment, noise levels would be less than significant at the property line for each related project. For this reason, on-site noise produced by any related project would not be additive to project-related noise levels. As the project's composite stationary-source impacts would be less than significant and not cumulatively considerable, the project would not contribute to a significant composite stationary-source noise impact in combination with other related projects. Therefore, cumulative operational noise would be less than significant. Impacts under Refined Alternative 2 would be comparable.

Because of the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the project, there is no potential for a cumulative construction or operational impacts with respect to ground-borne vibration.

As a result, the proposed project, in combination with these and other development projects in the City, does not have the potential to result in a significant cumulative temporary or permanent noise impacts (Draft EIR, pp. 4.D-25 through 4.D-27). Impacts under Refined Alternative 2 would be comparable.

#### **e. Transportation and Traffic**

##### **i. Potential Impacts Evaluated**

- Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (Draft EIR, p. 4.E-40)
- Would the project conflict with an applicable congestion management program (CMP), including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management

agency for designated roads or highways? (Draft EIR, p. 4.E-42)

- Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? (Draft EIR, p. 4.E-43)
- Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment; or result in inadequate emergency access? (Draft EIR, p. 4.E-43)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 15091**

As noted above and explained below, the EIR analysis determined that implementation of Refined Alternative 2 would not result in significant impacts related to the transportation and traffic impacts listed above. Where topical analysis and impact determinations for Refined Alternative 2, as provided in the Final EIR, did not differ from analysis provided for the original project in the Draft EIR, this is stated and the impact determinations in the Draft EIR and associated page numbers are cited.

**iv. Supporting Explanation**

The Draft EIR determined that construction of the original project would result in less than significant traffic impacts during construction. Under Refined Alternative 2, the duration of Phase V construction would be the same as under the original project, but the activities occurring within Phase V would be slightly different, since Refined Alternative 2 would involve grading and preparation of a larger building footprint (i.e., for two buildings instead of one), a reduced volume of earthwork since footings for the reduced-height buildings would require less excavation, and the construction of two buildings instead of one. Both the construction equipment mix and the number of construction workers required for Refined Alternative 2 would be slightly different, from that of the Project; while the number of workers, building construction, building coatings, and paving would be unchanged, the number of workers required for demolition and grading would increase only slightly because of the larger building footprint (increase in lot coverage) required for the two buildings. However, the reduction in earthwork volumes would reduce the number of haul trips required for soil export. For

these reasons, and with implementation of the Project Design Feature PDF-TRAF-2 which a Construction Staging and Management Plan, construction traffic impacts would be less than significant. (Final EIR pp. 3-22)

The Refined Alternative 2 would reduce the number of patient beds compared to the original project from a 690 to 642. Refined Alternative 2 would eliminate all of the Project's significant and unavoidable impacts at California Boulevard/Pasadena Avenue and the four roadway segment impacts along Bellefontaine Street between Orange Grove Boulevard and Fair Oaks Avenue, under existing (2011) conditions, ambient growth through 2032, and the related or cumulative projects expected to be developed within the study area through 2032. With implementation of Project Design Feature PDF-TRAF-2, which includes an Operational Traffic Management Plan, operational traffic impacts, including those related to CMP facilities would be less than significant. (Final EIR pp. 3-22 through 2-24)

Under the original project, the nearest CMP intersection monitoring stations to the project site are California Blvd./Pasadena Ave. (CMP Station #120, study intersection #10) and California Blvd./Arroyo Pkwy. (CMP Intersection #119, study intersection #15). The project would not exceed the CMP TIS guidelines analysis threshold of 50 or more trips at CMP intersections. Therefore, project impacts on these CMP intersections would be less than significant. Impacts under Refined Alternative 2 would be less than those of the original project and would also be less than significant.

The nearest freeway monitoring locations to the project site is the I-210 Freeway at Rosemead Boulevard (CMP Station #1061) which is within the trip distribution study area of the project. However, the project would not generate 150 or more trips (the CMP TIS guidelines threshold) at this freeway location during either the a.m. or p.m. peak hour. Therefore, project impacts on this CMP freeway location would be less than significant. (Draft EIR pp. 4.E-66 through 4.E-67)

Under the original project, based on the project site plan, the existing pedestrian access points into the project site would be maintained and no modifications of off-site intersections and roadway segments are proposed. In addition, there would not be a substantial increase in pedestrian traffic into and out of the hospital under the project, both because the proposed project represents the replacement of an existing hospital that already generates pedestrian traffic and because the increase in employees and patients at the project site under the proposed project would be limited. Also, the hospital has

access to adequate transit opportunities close by, including ARTS buses, Metro buses, and the Metro Gold Line Fillmore Street Station. Because the project would improve on-site pedestrian circulation and would not degrade existing off-site pedestrian circulation in the project area, the project's pedestrian circulation impact would be less than significant. (Draft EIR p. 4.E-67) Impacts under Refined Alternative 2 would be comparable.

Under the original project, based on the project site plan, the existing the existing vehicular entry portals, off-site roadway system, and on- and off-site pedestrian circulation and bicycle circulation systems would be maintained. Furthermore, engineering plans for the proposed West Tower and other proposed facilities would be subject to review and approval by the City of Pasadena Department of Public Works and the City's Fire Department to ensure that adequate emergency access is provided in accordance with City requirements, and that hazardous vehicular, pedestrian and bicycle conditions are avoided. Therefore, the project's emergency access and hazardous conditions impacts would be less than significant (Draft EIR p. 4.E-68). Impacts under Refined Alternative 2 would be comparable.

#### Cumulative Impacts

Under the original project, cumulative construction impacts would be temporary and would only occur during periods when construction of one or more of the cumulative projects is occurring at the same time as project construction, and then only to the extent that construction traffic is traveling on the same streets at the same time. Potential cumulative construction traffic impacts would be addressed through preparation and implementation of the Construction Staging and Traffic Management Plan required by and subject to review and approval by the City of Pasadena Department of Public Works for these projects. If cumulative construction traffic impacts were to occur, the project's contribution to such impacts would not be cumulatively considerable given mandatory compliance with City requirements for off-peak construction trips and implementation of the proposed Construction Staging and Traffic Management Plan. Accordingly, the project's incremental construction-related contribution to cumulatively significant intersection and roadway segment impacts, considered together with the related projects, would be less than cumulatively considerable (Draft EIR p. 4.E-70). Impacts under Refined Alternative 2 would be comparable.

As stated above, Refined Alternative 2 would reduce the number of patient beds compared to the original project from a 690 to 642. Refined Alternative 2 would eliminate all of the Project's cumulative significant and unavoidable

impacts at California Boulevard/Pasadena Avenue and the four roadway segment impacts along Bellefontaine Street between Orange Grove Boulevard and Fair Oaks Avenue, under existing (2011) conditions, ambient growth through 2032, and the related or cumulative projects expected to be developed within the study area through 2032. With implementation of Project Design Feature PDF-TRAF-2, which includes an Operational Traffic Management Plan, operational traffic impacts, including those related to CMP facilities would be less than significant. (Final EIR pp. 3-22 through 2-24)

#### **IV. RESOLUTION REGARDING ALTERNATIVES**

The City Council declares that the City has considered and rejected as infeasible Alternatives 1, No Project Alternative and Alternative 2, Reduced Patient Beds Alternative, identified in the Final EIR as set forth herein. CEQA requires that an EIR describe and evaluate the comparative merits of a reasonable range of alternatives to a project, or to the location of a project, that: (1) would feasibly attain most of the project objectives but would avoid or substantially lessen any significant impacts of the project, and (2) may be feasibly accomplished in a successful manner within a reasonable period of time considering the economic, environmental, social and technological factors involved. An EIR does not need to address alternatives that are not feasible, and the consideration of alternatives is to be judged against a rule of reason.

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

The Final EIR identified objectives for the project as follows (see Draft EIR, p.5-2):

- Refine the existing 20-year planning framework for the continued orderly development, modernization, and renovation of the existing Hospital campus that would help to ensure the long-term viability of existing and new buildings and provide newer, safer, and more efficient medical facilities and services to meet the health care needs of residents in Pasadena and surrounding communities;

- Accommodate expansion, modernization, and renovation of Huntington Memorial Hospital that will bring new buildings, utilities, and services on line over time, as needed, while ensuring continued operation and minimizing disruption of existing operations, and enabling further expansion of needed facilities;
- Improve access by consolidating acute-care facilities on the northern portion of the campus within the East Tower, East Tower Annex, West Tower, and the future West Town Annex and outpatient services on the eastern edge of the campus near the Gold Line station and new parking facilities within the new Huntington Pavilion and Wingate and Hahn Buildings;
- Support the vision of the South Fair Oaks Specific Plan area by facilitating the development of attractive, high-quality medical, bio-medical, and research institutions;
- Promote transit-oriented development in the South Fair Oaks Specific Plan area by creating new and enhanced pedestrian corridors and entryways that link the Hospital campus to nearby transit nodes including the Fillmore Gold Line transit station and nearby bus lines, and surrounding development including office, residential, research, medical, and commercial uses;
- Implement an efficient and accessible vehicular and pedestrian circulation system that improves access and accessibility for visitors and patients within and to the Hospital campus;
- Enlarge the landscaped green space at the heart of the Hospital campus to create an attractive pedestrian environment and passive recreational opportunities;
- Design a well-planned Hospital campus that is attractive and promotes quality development consistent with the visual character of Pasadena; and
- Construct buildings with an environmentally sustainable design which will minimize depletion of natural resources.

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

#### **a. Alternatives Considered But Rejected**

The City Council finds that all of the alternatives eliminated from further consideration in the Final EIR are infeasible, would not meet the basic project

objectives, and/or would not reduce or avoid any of the significant effects of the proposed project for the following reasons.

Alternative Site Uses were considered infeasible because the range of feasible alternative uses is severely limited because of the longstanding and continuing character of the project site, which includes the hospital and associated medical facilities, some of which are unique and of regional importance (e.g., the largest emergency department and only Level II Trauma Center in the San Gabriel Valley). Generally speaking, the selection of an alternative use at the project site has limited value in reducing the project's significant impacts. The project would result in two significant and unavoidable impacts: at the intersection of California Boulevard with Pasadena Avenue; and on four roadway segments along Bellefontaine Street. Construction of new facilities on the Hospital campus, no matter the proposed use that ultimately occupies them may also generate traffic that results in comparable and greater impacts on the same streets and intersections as the project. (Draft EIR, pp. 5-3-through 5-4)

Construction of the Project on an Alternate Site was dismissed as infeasible because of the historic use of the project site as a hospital campus. The proposed project builds on a series of previously approved Master Plan Amendments for the Hospital Campus, including completion of the long-planned West Tower Annex and associated parking, which is intended to mirror the existing East Tower Annex; demolishing obsolete buildings; implementing seismic upgrades of buildings as required by State law; and through building demolition, reconciling the BGSF cap with the previously approved cap, which has been exceeded due to the implementation of new construction prior to building demolition that was originally planned to precede it. Additionally, because of the limited buildable land within the Hospital Campus and the Hospital's desire to concentrate inpatient facilities west of Fairmont Avenue and outpatient facilities on the east side, adjacent to existing outpatient facilities leased by the Hospital to other entities, the Hospital's ability to redesign its proposed Campus and facilities is highly constrained. The current design is considered efficient in its proposed upgrading of older facilities and limited amount of new construction, such that the total BGSF following project implementation would be reduced compared to existing conditions, and would operate more efficiently in terms of energy demand. (Draft EIR, p. 5-4)

An Alternative Hospital Campus Access and Circulation was considered infeasible because redistributing vehicular trips away from existing access and circulation patterns would require reconfiguring access and circulation throughout

the Hospital campus as well as relocating existing parking structures, at considerable expense and additional construction-phase environmental impacts. Moreover, the access and circulation changes would have limited value in reducing the project's significant impacts. The project would result in two significant and unavoidable impacts: at the intersection of California Boulevard with Pasadena Avenue, and on four roadway segments along Bellefontaine Street. Changes to points of ingress and egress to the Hospital campus, as well as internal circulation patterns within the campus, would also generate traffic that results in comparable and greater impacts on the same streets and intersections as the project. (Draft EIR, pp. 5-4 through 5-5)

Alternative Master Plan Phasing were considered but rejected as infeasible because of the site constraints. When building within a confined, urbanized site such as the Huntington Hospital, staging and phasing are important considerations. The Hospital must maintain the proposed phasing to allow for hospital functions to be moved temporarily within the existing surplus areas, in order to maintain operations at a high level. (Draft EIR, p. 5-5)

A Reduced Height Alternative was dismissed as infeasible because it would not reduce the project's significant impacts. If the unprogrammed sixth story shell space is omitted, the height of the West Tower Annex building would be reduced to 76 feet; however, this alternative would result in the same number of beds as the project. All other components of the project would remain the same as for the project. The reduced height alternative would still result in two significant and unavoidable impacts: at the intersection of California Boulevard at Pasadena Avenue, and on four roadway segments along Bellefontaine Street. A reduction in height of the West Annex building would not mitigate the project's significant impacts, as it would not reduce the number of vehicle trips from the proposed project. Construction of new facilities on the Hospital campus with the inclusion of the same amount of beds as the project (65 new beds), no matter the height of the new development, would also generate traffic that results in comparable impacts on the same streets and intersections as the project; therefore, this alternative was eliminated from further consideration and evaluation. (Draft EIR, pp. 5-8 through 5-9)

#### **b. Alternative 1 – No Project Alternative**

Pursuant to Guidelines Section 15126.6, the EIR discussed a No Project Alternative. The No Project Alternative assumes that the Hospital campus would remain in its existing state, since there are no known predictable actions, such as an alternative project, that would be implemented on the property if the project

were not approved. The primary use of the property would continue to be hospital and related facilities. The proposed amendment of the Huntington Memorial Hospital Master Plan, which includes an adjustment of Plan area boundaries to remove 2.3 acres and add the 0.61-acre parcel at 620-624 Pasadena Avenue for a revised total area of 27.4 acres, would not occur, and the Plan area would remain at its existing 29.11 acres. The construction management buildings at 620-624 Pasadena Avenue, currently occupied by two construction management, would not be demolished to make way for construction of the proposed West Tower Annex, including its underground parking garage and new hospital beds and other facilities. No new buildings would be constructed.

Under implementation of No Project Alternative some environmental impacts would be similar to the proposed project and some environmental effects would be reduced. Impacts to aesthetics would be less than significant under the No Project Alternative, similar to the proposed project. Impacts to air quality, greenhouse gas emissions, noise and vibration and to traffic would be reduced as compared to the proposed project. The No Project Alternative would eliminate the proposed project's significant unavoidable impacts, including increases in traffic along the four affected Bellefontaine Street roadway segments and the California Boulevard/Pasadena Avenue intersection. (Draft EIR, pp. 5-11 through 5-13)

The No Project Alternative would reduce other less than significant project impacts, including impacts on aesthetic character and views of the San Gabriel Mountains, air quality impacts, GHG emissions, operational noise, and construction and operational traffic impacts other than the identified roadway segments along Bellefontaine Street and California Boulevard/Pasadena Avenue intersection.

Although the No Project Alternative would reduce or avoid the proposed project's environmental impacts, and would not result in any significant environmental impacts, it would not achieve most of the basic objectives of the proposed project. It would not refine the existing 20-year planning framework for the continued orderly development, modernization, and renovation of the existing Hospital campus that would provide newer, safer, and more efficient medical facilities and services that would meet the health care needs of residents in Pasadena and surrounding communities. The No Project Alternative would not improve access by consolidating acute-care facilities on the northern portion of the campus within the East Tower, East Tower Annex, West Tower, and the future West Town Annex and outpatient services on the eastern edge of the

campus near the Gold Line station and new parking facilities and within the new Huntington Pavilion and Wingate and Hahn Buildings. The No Project Alternative would not support the vision of the South Fair Oaks Specific Plan area by facilitating the development of attractive, high-quality medical, bio-medical, and research institutions, and it would not promote transit-oriented development in the South Fair Oaks Specific Plan area by creating new and enhanced pedestrian corridors and entryways that link the Hospital campus to nearby transit nodes. Further, the No Project Alternative would not implement an efficient and accessible vehicular and pedestrian circulation system that improves access and accessibility for visitors and patients or enlarge the landscaped green space at the heart of the Hospital campus to create an attractive pedestrian environment and passive recreational opportunities.

For CEQA purposes, this alternative is rejected because it would not meet any of the project objectives.

**c. Alternative 2 – Reduced Patient Beds Alternative**

The Reduced Patient Beds Alternative would reduce the increase in new patient beds proposed under the original project to 17, for a total of 642 licensed patient beds overall. This represents a reduction of 48 patient beds compared to the project, which proposes 65 new patient beds for a total of 690. The majority of the new patient beds under this Alternative would be housed in the proposed new West Tower Annex, which would still be constructed as under the original project, but would be built out to accommodate other facilities. It could include some shell space to accommodate the future expansion of Hospital departments. All other physical and operational components of the Reduced Patient Beds Alternative would remain the same as those proposed under the project, as would all entitlements sought for the project.

Under implementation of Reduced Patient Beds Alternative some environmental impacts would be similar to the proposed project and some environmental effects would be reduced. Impacts to aesthetics would be less than significant under the No Project Alternative, similar to the proposed project. Impacts to air quality, greenhouse gas emissions, noise and vibration and to traffic would be reduced as compared to the proposed project. The Reduced Patient Beds Alternative would eliminate the proposed project's significant unavoidable impacts, including increases in traffic along the four affected Bellefontaine Street roadway segments and the California Boulevard/Pasadena Avenue intersection. (Draft EIR, pp. 5-15 through 5-24)

The Reduced Patient Beds Alternative would eliminate the proposed project's significant and unmitigable operational impacts related to increases in traffic at the intersection of California Boulevard/Pasadena Avenue, as well as its significant and unavoidable impacts along four Bellefontaine Street roadway segments between Orange Grove Boulevard and Fair Oaks Avenue. This alternative would also reduce operational impacts related to air quality and GHG emissions, as the result of reduced trip generation, energy demand, water demand, and waste generation and the number of patient and visitor trips associated with the reduced number of patient beds.

Because no other exterior project characteristics would be changed under this alternative compared to the project, all other impacts under the Reduced Patient Beds Alternative would be comparable to those of the project, and would remain less than significant.

In addition to avoiding the proposed project's significant environmental impacts, the Reduced Patient Beds Alternative would achieve all of the basic objectives of the proposed project. It would refine the existing 20-year planning framework for the continued orderly development, modernization, and renovation of the existing Hospital campus that would provide newer, safer, and more efficient medical facilities and services that would meet the health care needs of residents in Pasadena and surrounding communities; accommodate expansion, modernization, and renovation of Huntington Memorial Hospital while ensuring continued operation and minimizing disruption of existing operations, and enabling further expansion of needed facilities; would improve access by consolidating acute-care facilities on the northern portion of the campus; would support the vision of the South Fair Oaks Specific Plan by facilitating the development of attractive, high-quality medical, bio-medical, and research institutions; and would promote transit-oriented development in the South Fair Oaks Specific Plan area by creating new and enhanced pedestrian corridors and entryways that link the Hospital campus to nearby transit nodes; would implement an efficient and accessible vehicular and pedestrian circulation system that improves access and accessibility for visitors and patients; enlarge the landscaped green space at the heart of the Hospital campus to create an attractive pedestrian environment and passive recreational opportunities; and ensure the design of a well-planned Hospital campus that is attractive and promotes quality development consistent with the visual character of Pasadena; and construct buildings with an environmentally sustainable design which will minimize depletion of natural resources. (Draft EIR, pp. 5-24 through 5-25)

For CEQA purposes, this alternative is rejected in favor of Refined Alternative 2, which further reduces the less than significant aesthetic impacts to adjacent residential areas identified for Alternative 2.

**d. Refined Alternative 2 – Reduced Patient Beds Alternative**

For the reasons discussed above, this Alternative is not rejected.

**V. RESOLUTION REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES**

State CEQA Guidelines Section 15126.2(c) requires an EIR to discuss the significant irreversible environmental changes which would be caused by the proposed project. Generally, an impact would occur under this category if, for example: (1) the project involved a large commitment of nonrenewable resources; (2) the primary and secondary impacts of the project would generally commit future generations to similar uses; (3) the project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and (4) the proposed consumption of resources are not justified (for example, results in wasteful use of resources).

Construction of the project would result in a commitment of limited, slowly renewable, and nonrenewable resources, such as construction materials and fossil fuels. Project operation would require use of nonrenewable resources similar to existing uses on the site and other developed areas within the City of Pasadena. These include energy resources such as electricity, petroleum-based fuels, fossil fuels, and water. Energy resources would be used for heating and cooling buildings, transportation within the project site, and building lighting. Despite conservation practices and guidelines in energy conservation, commitment to the use of the nonrenewable resources would be long-term. However, the continued use of such resources would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the nonrenewable resources would not result in significant irreversible changes to the environment.

Limited use of potentially hazardous materials such as typical cleaning agents and pesticides for landscaping would be used and contained on-site. During normal operations the project would generate medical waste, which would be similar to what is currently generated at the Hospital. These hazardous materials would be used, handled, stored, and disposed of in accordance with

manufacturer's instructions and applicable government regulations and standards. Staff is familiar with the requirements of handling, transporting, and disposing of medical waste. Compliance with these regulations and standards would serve to protect against significant and irreversible environmental change resulting from the accidental release of hazardous materials. In addition, demolition activities would comply with regulatory requirements to ensure that asbestos and lead-based paints are not released into the environment. Compliance with such regulations would serve to protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials. (Draft EIR, pp. 6-1 through 6-2)

#### **VI. RESOLUTION REGARDING GROWTH-INDUCING IMPACTS**

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

The project would be located in an urban area, well-served by existing infrastructure. No new off-site water, sewer, or drainage infrastructure would be needed and no new roads would be required. Because the project constitutes infill development within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, project implementation would not remove an obstacle to growth. (Draft EIR, p. 6-11)

#### **VII. RESOLUTION REGARDING ADOPTION OF MITIGATION MONITORING AND REPORTING PROGRAM**

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

#### **VIII. 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.

**IX. RESOLUTION REGARDING NOTICE OF DETERMINATION**

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

Adopted at the \_\_\_\_\_ 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**

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

---

This Mitigation Monitoring and Reporting Program (MMRP), which is provided in **Table 4-1, *Mitigation Monitoring***, has been prepared pursuant to Public Resources Code Section 21081.6, which requires adoption of a mitigation monitoring program for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. The City of Pasadena is the Lead Agency for the proposed Huntington Memorial Hospital Master Plan Amendment Project (the "Project") and therefore is responsible for administering and implementing the MMRP. The decision-makers must define specific monitoring requirements to be enforced during Project implementation prior to final approval of the proposed Project.

The primary purpose of the MMRP is to ensure that any mitigation measures identified in the Initial Study (IS), and Draft and Final EIR (designated by the respective environmental issue within Chapter 4.0 of the EIR) are implemented, thereby minimizing identified environmental effects. The only feasible mitigation measures identified for the proposed project are contained in the Initial Study, and those are included in this MMRP.

The MMRP for the Project will be in place through all phases of the Project, including preconstruction (prior to issuance of building permits), construction, and operation (both prior to and post-occupancy).

Each mitigation measure is categorized by impact area, with an accompanying identification of:

- The phase of the project during which the measure should be monitored;
  - Pre-construction
  - During construction
  - Prior to occupancy
  - Post-occupancy; and
- The responsible monitoring entity

Table 4-1

Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Phase	Responsible Monitoring Entity	Compliance Verification	
			Initial	Date
<b>Biological Resources (Nesting Birds)</b>				
<p><b>Mitigation Measure BIO1:</b> The Hospital or a designated representative shall ensure that impacts to migratory raptor and songbird species are avoided through one or more of the following methods: (1) vegetation removal activities shall be scheduled outside the nesting season for raptor and songbird species (nesting season typically occurs from February 15 to August 31) to avoid potential impacts to nesting species (this will ensure that no active nests will be disturbed and that habitat removal could proceed rapidly); and/or (2) Any construction activities or tree removal that could occur during the raptor and songbird nesting season shall require that all suitable habitat be thoroughly surveyed for the presence of nesting raptor and songbird species by a qualified biologist before commencement of clearing. If any active nests are detected, a buffer of at least 300 feet (500 feet for raptors) shall be delineated, flagged, and avoided until the nesting cycle is complete as determined by the qualified biologist to minimize impacts. The Hospital or a designated representative shall submit proof of compliance with this measure to the City of Pasadena Planning Department through the Mitigation Monitoring program prior to tree removal activities on-site.</p>	Pre-construction and during construction	Planning and Community Development Department		

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Phase	Responsible Monitoring Entity	Compliance Verification	
			Initial	Date
Cultural Resources (Previously Undiscovered Archaeological Resources)				
<p><b>Mitigation Measure CR1:</b> If archaeological resources are encountered during project implementation, and archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (the "Archaeologist") shall be immediately notified and retained by the applicant and approved by the City to oversee and carry out these mitigation measures.</p>	During construction	Planning and Community Development Department		
<p><b>Mitigation Measure CR2:</b> The qualified archaeologist should coordinate with the applicant as to the immediate treatment of the find until a proper site visit and evaluation is made by the archaeologist. The archaeologist shall be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find and determine appropriate treatment. Treatment will include the goals of preservation where practicable and public interpretation of historic and archaeological resources. All cultural resources recovered will be documented on California Department of Parks and Recreation Site Forms to be filed with the CHRIS-SCCIC. The archaeologist shall prepare a final report about the find to be filed with the Project Applicant, the City, and the CHRIS-SCCIC, as required by the California Office of Historic Preservation. The report shall include documentation and interpretation of resources recovered. Interpretation will include full evaluation of the eligibility with respect to the National and</p>	During construction	Planning and Community Development Department		

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Phase	Responsible Monitoring Entity	Compliance Verification	
			Initial	Date
<p>California Register and CEQA. The report shall also include all specialists' reports as appendices. The Lead Agency shall designate repositories in the event that significant resources are recovered. The archaeologist shall also determine the need for archaeological and Native American monitoring for any ground-disturbing activities thereafter. If a need is warranted, the archaeologist will develop a monitoring program in coordination with a Native American representative (if there is potential to encounter prehistoric or Native American resources), the applicant, and the City. The monitoring program will also include a treatment plan for any additional resources encountered and a final report on findings.</p>				
<p><b>Mitigation Measure CR3:</b> A qualified paleontologist shall attend a pre-grade meeting and develop a paleontological monitoring program to cover excavations in the event they occur into the older Quaternary Alluvium. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. If excavation into Quaternary Alluvium occurs, monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. If it is determined that excavation will not encounter Quaternary Alluvium, no further measures need be taken. The frequency of monitoring inspections shall be based on the rate of</p>	<p>During construction</p>	<p>Planning and Community Development Department</p>		

**Table 4-1 (Continued)**  
**Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Phase	Responsible Monitoring Entity	Compliance Verification	
			Initial	Date
excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered.				
<b>Mitigation Measure CR4:</b> If a fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage.	During construction	Planning and Community Development Department		
<b>Mitigation Measure CR5:</b> At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.	During construction	Planning and Community Development Department		
<b>Mitigation Measure CR6:</b> Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository.	During construction	Planning and Community Development Department		
<b>Mitigation Measure CR7:</b> Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.	During construction	Planning and Community Development Department		
<b>Mitigation Measure CR8:</b> If fossils are found following completion of the above tasks the paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the	During construction	Planning and Community Development Department		

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Phase	Responsible Monitoring Entity	Compliance Verification	
			Initial	Date
<p>applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.</p>				
<p><b>Mitigation Measure CR9:</b> If human remains are encountered unexpectedly during construction excavations and grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendant of the deceased Native American, who shall then help determine what course of action shall be taken in dealing with the remains. The applicant shall then under take additional steps as necessary in accordance with CEQA Guidelines Section 15064.5(e). Preservation of the remains in place or project design alternatives shall be considered as possible courses of action by the applicant, the City, and the Most Likely Descendant.</p>	<p>During construction</p>	<p>Planning and Community Development Department</p>		