

City of Pasadena

# All Saints Church Master Development Plan

## *Draft* Environmental Impact Report

Volume I: Text

July 2010



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## *Draft* Environmental Impact Report

### Volume I: Text

*Prepared by:*

**City of Pasadena**  
175 North Garfield Avenue  
Pasadena, CA 91101-1704

*Prepared with the assistance of:*

**Rincon Consultants, Inc.**  
790 East Santa Clara Street  
Ventura, California 93001

*July 2010*

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# All Saints Church Master Development Plan EIR

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*Volume II*

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- Appendix E: Land Use and Planning



## EXECUTIVE SUMMARY

This section summarizes the characteristics of the proposed project, alternatives, environmental impacts associated with the proposed project, mitigation measures, and the level of significance of project impacts after mitigation.

### PROJECT SYNOPSIS

#### Project Applicant

The Reverend J. Edwin Bacon, Jr. and Vestry  
All Saints Episcopal Church  
132 N. Euclid Avenue  
Pasadena, CA 91101

#### Project Description

All Saints' Episcopal Church has applied to the City of Pasadena for a Master Development Plan, which is a 15-year framework for expansion of the church. The project has been redesigned twice after prior review by the Planning Commission and Design Commission. The proposed project is described below as depicted in the application submittals and the preliminary design may change during design review. Graphics showing the proposed improvements and site location are contained in Section 2.0, *Project Description*. The proposed project consists of:

- Demolition of a commercial building (1,487 square feet), a building used for Sunday School/day care purposes (Scott Hall 6,195 square feet), and a trailer used for office and meeting space (1,800 square feet). Demolition of the steel canopy and cupola structure added between the Parish (Regas) Hall and the Rectory building.
- Interior renovation of the existing Rectory and conversion of the subterranean level of the existing parish hall (Regas House) to a music room (see Figure 2-4 – ground floor, Figure 2-8 – second floor, and Figure 2-9 Subterranean Plan)
- Relocation of the Maryland Hotel wall approximately three feet forward (west).
- Construction of a columbarium along the interior (east) property line.
- Construction of a subterranean parking level with approximately 12,500 square feet of office, storage and mechanical equipment areas and 122 or 128 parking spaces with vehicular access from Walnut Street (see Figure 2-9).
- The land-use entitlements under consideration include a minor conditional-use permit for use of tandem parking spaces as well as shared parking spaces for weekday uses (a day-care facility) and 50 commercial off-street parking spaces, variance to the off-street loading requirement, a variance to exceed the maximum setback requirement from Euclid Avenue, and setback variance for the columbarium.
- Outdoor spaces including a forecourt between the existing Rectory and West Building, a pre-function garden, an outdoor seating area on the north side of the



West Building, two play yards, and a garden with a labyrinth on the east portion of the site (see Figure 2-4).

- Construction of a multiple-story, four building complex (Buildings A, B, C, and E) in two phases. Note that there is no Building D. The new buildings consists of the following buildings:

**Building A: West Building.** A 14,300 square foot, two story (approximately 29-feet in height) building with offices, conference rooms, (social hall with kitchen) and a kitchen for an outdoor café (see Figure 2-4 –ground floor and Figure 2-8 –second floor). Adjacent to the West Building would be the outdoor dining commons. Gates would provide access from Euclid Avenue to the entrance of the courtyard café. A wrought-iron fence is proposed to connect the gates to the front of the building. The preliminary design proposes metal panels and a stone wall with cast-stone details for the northern portion of the building façades (All Saints Church Site Key Elevations West & North Senior Housing Option Plans, Richard Meier & Partners LLP Submitted: December 18, 2009). The building façade would be composed of glass doors and windows, a freestanding cast-stone colonnade, and perforated copper-mesh sunscreens (See Figures 4.1-3 and 4.1-4). The façade of the southern portion of the building would be behind the repositioned Maryland Hotel wall. The Maryland Hotel wall, a historic feature of the site, would be repositioned approximately three feet to the west. To accomplish the relocation, the wall would have to be substantially reconstructed in its new location. The church is proposing to relocate the wall to provide more open space between the wall and the west elevation of Building A. Moving the wall forward would also facilitate public pedestrian access along the east side of the wall to the courtyard café via a new walkway. Two palm trees that line the sidewalk west of the wall would be boxed and replanted next to the wall to maintain their existing spatial arrangement with the wall.

**Building B: Forum – Alternate Worship.** A 6,700 square foot, two-level (approximately 54 feet in height) assembly building (see Figure 2-4 –ground floor and Figure 2-8 – second floor) would be circular in plan composed of four slightly curved walls: one to the north, one to the east, and two to the south. It would be constructed with cast-in-place concrete and include glass windows along the west-facing façade. The space would open into a plaza that could be used as supplemental outdoor seating for large events. Stained glass windows would be used in the building along with sky-lights to provide natural lighting. A straight wall of eight to ten feet would run from the southern boundary of the Forum toward the existing Regas House. It would be clad with stone to relate to the granite walls of the existing historic church buildings. The entrance to the building would be composed of scored colored-concrete paving. A labyrinth and contemplative garden would be adjacent to the southeastern edge of the building.

**Building C: East Building.** An 18,000 square foot, three-story (approximately 54 feet in height) building would house a youth program, daycare, and classroom areas (see Figure 2-4 – ground floor and Figure 2-8 -second floor). This building would be built in simple modular form with architectural concrete and would have a column grid/glass façade along the western elevation. A row of sycamore trees would be planted in front of the western elevation of the building. The ground-floor level of the building would contain classrooms with doors opening onto the children’s play yard for indoor/outdoor teaching directly in front of the building to the west.



**Building E: North Building.** Two options are under consideration for the building at the northwest corner of the site:

*Scenario 1:* A 47,500 square foot, eight-story (approximately 75 feet in height), 45-unit residential building for senior citizens (see Figure 2-3, Figure 2-4, and Figure 2-5). The proposed building would be of cement plaster construction. The southern portion of the Euclid Avenue frontage would be partially behind a stone wall. Entry doors to the building would be at the northern portion of the building's frontage on to Euclid Avenue. The proposed building would be setback further than the existing restaurant adjacent to the east of the project site along Walnut Street. A stone wall would screen the center portion of the Walnut Street frontage of the building. The proposed building would have an ingress/egress ramp to the 122-space subterranean parking garage, accessible from Walnut Street at the building's eastern boundary. The building would have non-reflective glass windows and residential units on the upper six floors would have balconies.

*Scenario 2:* A two-story (approximately 41 feet in height), 13,000 square-foot youth recreation building (see Figure 2-6, Figure 2-7 and Figure 2-8). The building would have an exterior finish of cement plaster. The southern portion of the Euclid Avenue frontage would be partially behind a stone wall. Entry doors would be at the northern portion of the frontage on Euclid Avenue. The ground-level frontage along Euclid Avenue would have windows of various sizes and rectangular shapes. The proposed building would be setback further than the existing restaurant adjacent to the east of the project site along Walnut Street. A stone wall would screen the center portion of the Walnut Street frontage of the building. The proposed building would have an ingress/egress ramp to the 128-space subterranean parking garage, accessible from Walnut Street at the building's eastern boundary.

The project consists of a total of 42,118 square feet of new church support uses and 45 residential units (Scenario 1), or 55,118 square feet of new church support uses (Scenario 2). The project will be designed consistent with Leadership in Energy and Environmental Design (LEED) certification pursuant to the requirements of Municipal Code 14.90.040. The LEED program is designed to assign credits for environmentally-friendly design features and construction practices, so that projects may have less impact on the environment than standard construction would.

### **Areas of Public Concern**

A scoping meeting was held for this project on October 28, 2009. Issues of public concern included cultural resources, aesthetics, light and glare, traffic, alternatives, and sustainability. Table 1-1 in Section 1.0, *Introduction*, details scoping meeting comments and how these comments have been addressed.

Concerns regarding aesthetics, air quality, transportation, land use/planning, and historic resources were addressed within the body of the EIR. In addition, general areas of public concern throughout California include the topics of water and global climate change. Water resources are



addressed in Section 4.5, *Water Supply*, while global climate change has been addressed following the discussion of cumulative impacts in Section 4.2, *Air Quality*.

## ALTERNATIVES

Four alternatives to the proposed project were selected for consideration, as described below.

**Alternative 1 - No Project.** This alternative assumes that the proposed project would not be developed and that existing development on the project site would remain. Under this alternative, the visual character of the project site would remain in its current state.

**Alternative 2 - Retain the Maryland Hotel Wall.** This alternative retains the historic Maryland Hotel wall in place. It avoids the Class I, *significant and unavoidable*, impact to historic resources.

**Alternative 3 - Retain Maryland Hotel Wall and Relocate Building 'A'.** This alternative retains the historic Maryland Hotel wall in place and relocates Building 'A' to the east. These changes to the site plan avoid the Class I, *significant and unavoidable*, impact to historic resources.

**Alternative 4 - Retain Maryland Hotel Wall and Rotate Building 'A' (Combine Buildings A & C).** This alternative retains the Maryland Hotel wall in place and reconfigures Building 'A' by rotating it 90 degrees and combining it with Building C. This alternative avoids the Class I, *significant and unavoidable*, impact to historic resources.

Of the alternatives described above, Alternative 1 (No Project) and Alternative 4 (Retain Maryland Hotel Wall and Rotate Building A) conflict with the project objectives that were provided by the project architect. Alternatives 2 and 3 are both environmentally superior to the proposed project because they eliminate the Class I, unavoidably significant, impact associated with reconstruction of the Maryland Hotel Wall. Alternative 3 would provide a nine-foot setback from the wall, which may be considered preferable aesthetically and from a historic perspective, though the environmental impacts are the same as those of a six-foot setback.

## SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table ES-1 lists the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts. Impacts are categorized by classes. Class I impacts are defined as significant, unavoidable adverse impacts, which require a statement of overriding considerations pursuant to Section 15093 of the *CEQA Guidelines* if the project is approved. Class II impacts are significant adverse impacts that can be feasibly mitigated to less than significant levels and that require findings to be made under Section 15091 of the *CEQA Guidelines*. Class III impacts are adverse, but less than adopted significance thresholds. Class IV impacts are beneficial.



**Table ES-1  
 Summary of Impacts, Mitigation Measures, and Significance After Mitigation**

Impact	Mitigation Measures	Significance After Mitigation
<b>AESTHETICS</b>		
<p><b>Impact AES-1</b> The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings and is consistent with applicable policies of the Central District Specific Plan as well as Citywide Design Principles and Criteria. Therefore, these impacts would be Class III, less than significant.</p>	None required.	Less than significant.
<p><b>Impact AES-2</b> The proposed project could alter views of the mountains as compared with current conditions from locations along North Euclid Avenue adjacent the site, and from portions of City Hall opposite the site under Scenario 1 Senior Residential, due to the construction of an eight-story building. Construction of a two-story building under Scenario 2 would not alter views of the mountains as compared with current conditions. Because the mountains are currently partially obscured by existing development and because the project under either scenario would not substantially exacerbate a reduction in viewshed, the impact would be Class III, less than significant.</p>	None required.	Less than significant.
<p><b>Impact AES-3</b> The proposed project is shown in preliminary designs as composed predominantly of concrete, stone, metal and glass and would be constructed in the Civic Center sub-district of the Central District Specific Plan Area. The project has the potential to contribute to increased light and glare. The impact would be Class II, significant but mitigable.</p>	<p><b>AES-3 (a) Glare Minimization.</b> To minimize the amount of glare associated with the glass ceiling of Building B, the exterior glass shall have low reflectivity. Compliance with the intent of minimizing light spillover shall be determined during the design review process. The project contractor shall submit a report to the Planning Director verifying installation of the materials specified.</p> <p><b>AES-3 (b) Light Spillover Minimization.</b> To minimize the amount of light spillover that emanates from the site onto surrounding properties and into the night sky, the following measures shall be implemented in the project design. Compliance with the intent of minimizing light spillover shall be determined during the design review process. The project contractor shall submit a report to the Planning Director verifying installation of the materials specified.</p> <ul style="list-style-type: none"> <li>• A lighting plan shall be prepared that shows All Saints campus lighting is of a pedestrian scale, highlighting landscape and pedestrian scaled features, and that is</li> </ul>	Less than significant.



**Table ES-1  
 Summary of Impacts, Mitigation Measures, and Significance After Mitigation**

Impact	Mitigation Measures	Significance After Mitigation
	downcast, minimizing light spillover to surrounding properties. Maximum horizontal and vertical illuminance shall be 0.05 foot-candle at 15 feet from the site boundary (LEED ND GIB Credit 17: Light Pollution Reduction). <ul style="list-style-type: none"> <li>• Full illumination of the Forum Building (Building B) shall only occur during events and architectural or landscape lighting throughout the All Saints Campus shall be reduced during non-operational hours of the night to save energy and minimize light spillover.</li> <li>• Security lighting shall be triggered by sensors to the extent feasible and practicable.</li> </ul>	
<b>AIR QUALITY</b>		
<b>Impact AQ-1</b> Air pollutant emissions generated by construction of the proposed project would not exceed SCAQMD thresholds for NO <sub>x</sub> , CO, SO <sub>2</sub> , or PM <sub>10</sub> or PM <sub>2.5</sub> under either scenario. This is a Class III, less-than-significant impact.	None Required.	Less than significant.
<b>Impact AQ-2</b> Demolition of existing structures under both scenarios could release asbestos into the environment; however, compliance with existing SCAQMD regulations would ensure that impacts would be Class III, less than significant.	None Required.	Less than significant.
<b>Impact AQ-3</b> Operation of the proposed project would generate air pollutant emissions, but emissions would not exceed SCAQMD operational significance thresholds under either scenario. Therefore, the project's operational impact to regional air quality would be Class III, less than significant.	None required.	Less than significant.
<b>HISTORIC RESOURCES</b>		
<b>Impact HR-1</b> Implementation of either Scenario 1 or 2 would result in the demolition of Scott Hall in addition to steel framing and a cupola structure between the Regas House and the Rectory Building. Scott Hall and the steel-framed tower are later additions to the campus and are not designated historic resources. Removal of these later additions is a Class III, less than	None required.	Less than significant.



**Table ES-1  
 Summary of Impacts, Mitigation Measures, and Significance After Mitigation**

Impact	Mitigation Measures	Significance After Mitigation
significant impact.		
<p><b>Impact HR-2</b> Implementation of development facilitated by the project would require the relocation, reconstruction and encroachment onto the setting of the Maryland Hotel wall, which is a contributing element to a designated historic district. No mitigation is available to reduce impacts resulting from the loss of this resource. Therefore, impacts are Class I, unavoidably significant.</p>	<p><b>HR-2(a) Conformance with Standards.</b> Prior to the issuance of building permits, the City of Pasadena shall find that the final architectural plans for the proposed reconstruction of the Maryland Hotel wall conform to the Secretary of the Interior's Standards for Reconstruction. No building permit shall be issued unless such a finding can be made.</p> <p><b>HR-2(b) Historic Documentation Report.</b> A historic preservation professional qualified in accordance with the Secretary of the Interior's Standards shall be selected by the City of Pasadena to complete a documentation report on the Maryland Hotel Wall. The structure to be relocated shall be documented with archival quality photographs of a type and format approved by the City of Pasadena. This documentation, along with historical background of the property, shall be submitted to an appropriate repository approved by the city. The documentation reports shall be completed and approved by the City of Pasadena prior to the issuance of building permits, and utilized during concept design review in their evaluation of the design for the reconstructed wall.</p>	Unavoidably Significant
<p><b>Impact HR-3</b> Development that would occur under Scenarios 1 and 2 would result in the construction of new structures within the setting of an NRHP Historic District. However, the project conforms to the Secretary of the Interior's Standards in terms of project size, scale, proportion and massing in comparison to other buildings in the district. Impacts would be Class II, significant but mitigable.</p>	<p><b>HR-3 Independent Assessment Report.</b> The Planning Director shall select a historic preservation professional, at the project applicant's expense, to conduct an independent assessment of compliance of the final project design in terms of Secretary of the Interior's Standards. The report shall be submitted to the Planning Director and be utilized by staff in their evaluation of the design for concept design review and recommendations for concept design review.</p>	Less than significant
<p><b>Impact HR-4</b> Demolition of structures and project construction could temporarily generate groundborne vibrations on and adjacent to the site which have the potential to affect historical resources. Implementation of mitigations measures would reduce impacts to Class II, significant but mitigable.</p>	<p><b>HR-4 Construction Vibration.</b> Construction Vibration. The applicant shall retain a structural engineer to prepare a detailed construction vibration reduction plan describing the activities to be performed during the demolition and construction phases. The report shall document methodology necessary such that the PPV 0.25 (in/sec) threshold is not exceeded. The PPV 0.25 (in/sec) threshold may be superseded based on structural integrity of the most sensitive/most affected historic resource as documented by the structural engineer. The vibration reduction report shall include but not be limited to the following.</p> <ul style="list-style-type: none"> <li>• Construction equipment sizes, functions, &amp; duration of activities</li> <li>• Distances to the historic resources from construction activity</li> <li>• Structural integrity of the historic resources</li> </ul>	Less than significant



**Table ES-1  
 Summary of Impacts, Mitigation Measures, and Significance After Mitigation**

Impact	Mitigation Measures	Significance After Mitigation
	<ul style="list-style-type: none"> <li>• Recommendations for vibration reduction strategies necessary to avoid damaging historic resources, including the Regas House, the Rectory, the Church, the Maryland Hotel Wall, and City Hall.</li> </ul> <p>Prior to the start of demolition or construction, the applicant shall retain services of a structural engineer to monitor the demolitions and vibration and submit periodic reports to the Planning Director. The report shall address the procedures for vibration control. Vibration reduction strategies could be accomplished through the following.</p> <ul style="list-style-type: none"> <li>• Limiting the size of equipment within 25 feet of the historical resources</li> <li>• Staging larger equipment further away</li> <li>• Phasing demolition and excavation separately so that earth-moving and ground-impacting operations do not occur within the same time period.</li> </ul> <p>During construction activities, the contractor shall implement vibration reduction controls in the plan as detailed by the structural engineer. Compliance with the vibration reduction plan will be monitored during construction by the project contractor and a compliance report shall be submitted to the Planning Director.</p>	
<b>TRANSPORTATION/PARKING</b>		
<p><b>Impact T-1</b> The proposed project would incrementally increase traffic operational levels at analyzed intersections under both Scenario 1, Senior Residential and Scenario 2, Youth Recreation. The increased operational traffic levels would not cause an exceedance of adopted significance criteria at any of the nine intersections under either Scenario. Therefore, the proposed project's traffic impacts would be Class III, less than significant for both Scenario 1 and Scenario 2.</p>	None required	Less than significant.
<p><b>Impact T-2</b> The proposed project would cause an incremental decrease in ADT on Euclid Avenue between Walnut Street and Corson Street, and would cause a 3.5 to 4.5% increase in ADT along Euclid Avenue between Union Street and Walnut Street under both Scenario 1 and Scenario 2. The impact to street segments would be Class II, significant but mitigable, for both</p>	<p><b>T-2 Street Segment Mitigation.</b> The proposed project shall contribute funds to the City of Pasadena's Citywide Traffic Monitoring Program, and complete a Transportation Demand Management Plan in accordance with the City's Trip Reduction Ordinance requirements (Municipal Code § 17.46.290 and §10.64). The approved TDM Plan may include the following items:</p> <ol style="list-style-type: none"> <li>1. Private vanpool operation;</li> </ol>	Less than significant.



**Table ES-1  
 Summary of Impacts, Mitigation Measures, and Significance After Mitigation**

Impact	Mitigation Measures	Significance After Mitigation
<p>scenarios due to the increase in ADT along Euclid Avenue between Union Street and Walnut Street.</p>	<p>2. Transit and vanpool fare subsidies;                      3. Pay parking for employees;                      4. Provision of subscription bus services;                      5. Alternative work hours;                      6. Capital improvements for transit services;                      7. Reduction of parking fees for carpools and vanpools;                      8. Bikeway linkages to established bicycle routes;                      9. Provision of an on-site employee transportation coordinator</p>	
<p><b>Impact T-3</b> Based on project parking demand, the project has a surplus of four (4) parking spaces during weekdays and 500 spaces on typical Sundays under Scenario 1. The project has a surplus of seven (7) during weekdays and 510 spaces on typical Sundays under Scenario 2. Therefore, impacts to parking supply would be Class III, less than significant, for both Scenario 1 and Scenario 2.</p>	<p>None Required.</p>	<p>Less than significant.</p>
<p><b>Impact T-4</b> On Sundays, the proposed project would incrementally increase traffic operational levels at study area intersections under Scenario 1, Senior Residential and Scenario 2, Youth Recreation. The increased traffic operational levels would not cause an exceedance of adopted significance criteria at any of the nine intersections for either Scenario. Therefore, the proposed project's traffic impacts with respect to Sunday mid-day peak hour traffic volumes would be Class III, less than significant, for both Scenario 1 and Scenario 2.</p>	<p>None Required.</p>	<p>Less than significant.</p>
<p><b>Impact T-5</b> The proposed project would not generate trips exceeding CMP criteria at CMP locations under either Scenario 1 or Scenario 2. Thus, impacts to CMP routes are considered Class III, less than significant for both Scenario 1 and Scenario 2.</p>	<p>None Required.</p>	<p>Less than significant.</p>
<p><b>Impact T-6</b> The preliminary designs showing access and circulation within the subterranean garage under both Scenario 1 and Scenario 2 indicate there are impediments to free circulation. This is a Class II, significant but mitigable, impact for both Scenario 1 and Scenario 2.</p>	<p><b>T-6(a) Ramp Alignment.</b> For Scenario 1, Senior Residential, and Scenario 2, Youth Recreation, the drive ramp shall be aligned with the parking aisle or otherwise designed to ensure safe passage and that queuing shall not impede circulation, subject to review and approval by the City of Pasadena Department of Transportation.</p> <p><b>T-6(b) Parking Reconfiguration.</b> For Scenario 2, Youth Recreation, the parking spaces shall be reconfigured to ensure unimpeded passage subject</p>	<p>Less than significant.</p>



**Table ES-1  
 Summary of Impacts, Mitigation Measures, and Significance After Mitigation**

Impact	Mitigation Measures	Significance After Mitigation
	to review and approval by the City of Pasadena Department of Transportation. Additional off-site parking may be provided in accordance with standard City policies regarding shared parking, subject to review and approval by the City of Pasadena Department of Transportation.	
<b>WATER SUPPLY</b>		
<b>Impact W-1</b> The proposed project would generate increased demand for water. The PWP would be able to supply the projected demand based on existing entitlements provided that the proposed project incorporates conservation. Therefore, impacts to water supply would be Class II, significant but mitigable.	<b>W-1 Water Efficiency.</b> In accordance with LEED NC prerequisites, the applicant shall employ strategies that in aggregate use 20% less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements. Calculations are based on estimated occupant usage and shall include only the following fixtures (as applicable to the building): water closets, urinals, lavatory faucets, showers and kitchen sinks.	Less than significant.
<b>LAND USE AND PLANNING</b>		
<b>Impact LUP-1</b> Scenario 1 and Scenario 2 of the proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, adopted for the purpose of avoiding or mitigating an environmental effect. Scenario 1 and Scenario 2 of the project would not conflict with the City of Pasadena's General Plan, Central District Specific Plan, or Zoning Ordinance. Scenario 1 and Scenario 2 of the project layout implement the objectives of the Specific Plan to provide active uses and a comfortable pedestrian environment along the street edge. The site plan has already been modified in response to direction from the Planning Commission and Design Commission. Therefore, the proposed project would not cause any significant land use impacts and the impact would be Class III, less than significant.	None Required.	Less than significant.
<b>INITIAL STUDY</b>		
<b>Initial Study Section 6d.</b> The project will require the removal of 44 non-protected trees. While the site is located in a developed urban area, given the number and size of trees proposed for removal, a mitigation measure (BIO 1) is included that requires the applicant to comply with the Federal Migratory Bird Act. With adherence to the mitigation measure,	<b>BIO 1:</b> Construction of the project shall comply with the provisions of the Federal Migratory Bird Act and disturbance or removal of existing vegetation shall take place outside of the breeding bird season of March 1 to August 31 to avoid take of migratory birds (including disturbances which would cause abandonment of active nests containing eggs and/or young). If the project cannot avoid the breeding season, nest surveys shall be conducted by a qualified biologist prior to demolition or	Less than significant.



**Table ES-1  
 Summary of Impacts, Mitigation Measures, and Significance After Mitigation**

Impact	Mitigation Measures	Significance After Mitigation
<p>the project will not interfere with the movement of any migratory wildlife species or with migratory wildlife corridors. This is a Class II, significant but mitigable, impact.</p>	<p>removal of trees. Active nests shall be avoided and provided with a buffer of at least 100 feet (300 feet for Raptors). No work shall occur within the buffer zone until all young have fledged the nest as confirmed by the site biologist, which will not likely occur until the end of the breeding season. The applicant shall record the results of the recommended protective measures to document compliance with applicable State and Federal laws pertaining to the protection of native birds.</p>	
<p><b>Initial Study Section 7b.</b> If archaeological resources are unearthed during construction, the project could have the potential to adversely affect such resources. A mitigation measure (CR 1) is included that requires work to stop in the vicinity of the resource, consultation with an archaeologist, a course of action based on the nature of the find, and clearance to resume construction activities. With adherence to the mitigation measure, the project will not adversely affect significant or unique archaeological resources. This is a Class II, significant but mitigable, impact.</p>	<p><b>CR 1:</b> If archaeological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until an archeologist certified by the Society of Professional Archeologists examines the site, identifies the archaeological significance of the find, and recommends a course of action. Construction shall not resume until the site archaeologist states in writing that the proposed construction activities will not significantly damage archaeological resources.</p>	<p>Less than significant.</p>
<p><b>Initial Study Section 7c.</b> If paleontological resources are unearthed during construction, the project could have the potential to adversely affect such resources. This is a Class II, significant but mitigable, impact.</p>	<p><b>CR 2:</b> If paleontological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until a paleontologist meeting the satisfaction of the Natural History Museum of Los Angeles County identifies the paleontological significance of the find, and recommends a course of action. Construction shall not resume until the site paleontologist states in writing that the proposed construction activities will not significantly damage paleontological resources.</p>	<p>Less than significant.</p>
<p><b>Initial Study Section 19e.</b> The increase in density associated with the project would require upgrades to wastewater conveyance infrastructure. A mitigation measure (Utilities 1) has been included that will require the developer to make the appropriate infrastructure upgrades or pay fair share fees. This is a Class II, significant but mitigable, impact.</p>	<p><b>UTILITIES 1:</b> The applicant shall either correct the sewer deficiency on Colorado Boulevard between Euclid Avenue and Los Robles Avenue, a length of 456 feet, and in Los Robles Avenue between Marengo Avenue and 315 feet north of Marengo Avenue or pay their share of a fee that the City will use to correct the deficiency.</p>	<p>Less than significant.</p>



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