

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

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### A. INTRODUCTION

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the California Environmental Quality Act (CEQA) Guidelines requires that:

*[I]n order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.*

The City of Pasadena (City) has been designated as the Lead Agency for the proposed project.

Where appropriate, the project’s Draft and Final EIRs identified mitigation measures to avoid or to mitigate potential impacts identified to a level where no significant impact on the environment would occur. This Mitigation Monitoring and Reporting Program (MMRP) is designed to monitor implementation of the project’s mitigation measures.

As shown on the following pages, each required mitigation measure for the proposed project is listed, according to environmental impact area, together with the following information:

- **Monitoring/ Enforcement Agency:** The agency responsible for verifying compliance with and implementation of required mitigation measures, and/or the agency with the power to enforce required mitigation measures.
- **Timeframes for Mitigation Implementation & Enforcement:** Defines **1)** the precise phase(s) of the project during which each mitigation measure must be implemented or completed by the project Applicant (Pasadena Water & Power Department), including the performance of monitoring and submittal of required monitoring/certification reports to demonstrate compliance, and **2)** the project milestone(s) at which mitigation compliance must be verified by the Monitoring/Enforcement Agency. These phases and milestones may be pre-demolition or pre-construction; during demolition or construction; or prior to, during, or post-project operation or occupancy.
- **Verification of Compliance:** Confirmation by the Monitoring/Enforcement Agency that compliance with required mitigation measures has been achieved.

The Glenarm Power Plant Repowering Project’s MMRP will be in place during the design development, pre-demolition, demolition, and construction phases of the project. The project Applicant or qualified designee will be responsible for implementing all mitigation measures as noted in **Table 4-1, Mitigation Monitoring and Reporting Program**, and will also be obligated to provide certification, as identified below, to the

appropriate monitoring or enforcement agency that compliance with the required mitigation measure has been achieved. The City's existing planning and other pertinent administrative processes will be used as the basic foundation for the MMRP procedures.

The substance and timing of each certification report that is submitted to the City will be at the discretion of the City. Generally, each report will be submitted to the City in a timely manner following completion/implementation of the applicable mitigation measure and shall include sufficient information to allow the City to reasonably determine whether the intent of the measure has been satisfied. The City, in conjunction with the project Applicant, will assure that project demolition and construction occurs in accordance with the MMRP.

## **B. MITIGATION MONITORING AND REPORTING PROGRAM**

The MMRP is presented in below, in **Table 4-1**, *Mitigation Monitoring and Reporting Program*, and it lists each mitigation measure, phase of implementation, frequency and/or duration of required monitoring, method of reporting monitoring results to the City, and the responsible monitoring party.

Table 4-1

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
		Applicant Implementation	Agency Enforcement	Initial	Date	Remarks
<b>1. Air Quality</b>						
<b>Mitigation Measure AQ-1:</b> The Pasadena Water & Power Department and its contractors, via the City of Pasadena Public Works Department, shall require the implementation of a “Construction Staging and Traffic Management Plan” that provides for a temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.	City of Pasadena Planning Division (Zoning Administrator)	During construction	During construction			
<b>Mitigation Measure AQ-2:</b> The Pasadena Water & Power Department and its contractors, in consultation with the City of Pasadena Department of Transportation, shall require the implementation of a “Construction Staging and Traffic Management Plan” that identifies an on-site dedicated turn lane for the movement of construction trucks and equipment. When turning off-site, trucks will be required to utilize the on-site dedicated turn lane described in the plan.	City of Pasadena Planning Division (Zoning Administrator)	During construction	During construction			
<b>Mitigation Measure AQ-3:</b> The Pasadena Water & Power Department and its contractors shall require the implementation of a “Construction Staging and Traffic Management Plan” that provides for a construction relations officer to act as a community liaison concerning on-site construction activity	City of Pasadena Planning Division (Zoning Administrator)	During construction	During construction			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
		Applicant Implementation	Agency Enforcement	Initial	Date	Remarks
including resolution of issues related to PM10 generation.						
<b>Mitigation Measure AQ-4:</b> The Pasadena Water & Power Department and its contractors shall require that all vehicles and equipment are properly tuned and maintained according to manufacturers' specifications.	City of Pasadena Planning Division (Zoning Administrator)	During construction	During construction			
<b>Mitigation Measure AQ-5:</b> The Pasadena Water & Power Department and its contractors shall require the use of coatings and solvents with a VOC content that exceeds the requirements of Rule 1113 if available. All coatings and solvents shall at a minimum meet the requirements of Rule 1113 unless exempted.	City of Pasadena Planning Division (Zoning Administrator)	During construction	During construction			
<b>Mitigation Measure AQ-6:</b> The Pasadena Water & Power Department and its contractors shall use construction materials that do not require painting to the extent economically feasible and that meet the project's structural, acoustical, aesthetic, or other needs.	City of Pasadena Planning Division (Zoning Administrator)	During construction	During construction			
<b>Mitigation Measure AQ-7:</b> The Pasadena Water & Power Department and its contractors shall use pre-painted construction materials for major equipment. Materials that require field coating are exempt from this measure.	City of Pasadena Planning Division (Zoning Administrator)	During construction	During construction			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
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<p><b>Mitigation Measure AQ-8:</b> The Pasadena Water &amp; Power Department and its contractors shall require contractors to use model year 2007 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) pursuant to California Code of Regulations, Title 13, §2025.</p>	<p>City of Pasadena Planning Division (Zoning Administrator)</p>	<p>During construction</p>	<p>During construction</p>			
<p><b>Mitigation Measure AQ-9:</b> The Pasadena Water &amp; Power Department and its contractors shall require the use of internal combustion engines/construction equipment that operate on the project site to meet the following:</p> <ul style="list-style-type: none"> <li>• At least 50 percent of construction equipment greater than 250 hp, which are on-site for 6 or more consecutive work days, shall meet Tier 3 emissions standards and be outfitted with BACT devices (e.g., Level 3 diesel emissions control devices) certified by CARB.</li> <li>• A copy of each unit’s certified tier specification and BACT documentation shall be available for inspection during construction. The contractor(s) shall monitor and record compliance for each project construction phase and document efforts undertaken to increase the use of compliant off-road vehicles, such as but not limited to bid</li> </ul>	<p>City of Pasadena Planning Division (Zoning Administrator)</p>	<p>During construction</p>	<p>During construction</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

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<p>solicitation documents, fleet registration of successful vendor(s), etc.</p> <ul style="list-style-type: none"> <li>Construction contractors supplying heavy duty diesel equipment, greater than 50 hp, will be encouraged to apply for AQMD SOON funds. Information including the AQMD website will be provided to each contractor which uses heavy duty diesel for on-site construction activities.</li> </ul>						
<b>2. CULTURAL RESOURCES</b>						
<p><b>Mitigation Measure CULT-1: Recordation and Photography.</b> Prior to removal of the boilers, a Historic American Buildings Survey (HABS) level III recordation shall be prepared. The boilers, their infrastructure, and the hallway created by the boilers shall be documented in as-built drawings, large format black-and-white photographs, and a written narrative in accordance with HABS requirements. Completion and submittal of the HABS level III recordation of the boilers is required before City issuance of demolition and building permits for the Glenarm Building. This documentation shall be prepared by a qualified architectural historian or historic architect and a photographer experienced in Historic</p>	<p>City of Pasadena Design and Historic Preservation Section to review HABS Level III documentation, verify submittal to the required repositories, and verify preparation of photographs for use in interpretive display required by mitigation measure CULT-2.</p> <p>City of Pasadena Planning Division to verify receipt of completed HABS documentation from Applicant.</p>	<p>Prior to any demolition within the Glenarm Building, Applicant to retain qualified architectural historian or historic architect and photographer to complete HABS documentation.</p> <p>Prior to any demolition within the Glenarm Building, Applicant to ensure submittal of completed HABS documentation to the required repositories and</p>	<p>Prior to City's issuance of demolition and building permits for the Glenarm Building, Design and Historic Preservation Section to review and approve HABS documentation.</p> <p>Prior to City's issuance of demolition and building permits for the Glenarm Building, Design and Historic Preservation Section to verify submittal of completed HABS</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
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American Building Survey (HABS) photography. Original archival prints shall be submitted to the Library of Congress, the California Office of Historic Preservation, the City of Pasadena Planning and Development Department and the Pasadena Public Library. Furthermore, copies of the photographs shall be used in the mitigation measure CULT-2 display.		the Planning Division.  Prior to the commencement of project operation, Applicant to ensure preparation of photographs for inclusion in interpretive exhibit as required by mitigation measure CULT-2.	documentation.  Prior to the commencement of project operation, Design and Historic Preservation Section to verify preparation of photographs for inclusion in the interpretive exhibit, as required by mitigation measure CULT-2.			
<b>Mitigation Measure CULT-2: Interpretive Architectural Exhibit.</b> An interpretive exhibit displaying the original layout and operation of the floor-to-ceiling hallway shall be constructed in the location of the existing character-defining hallway. This interpretive display shall be created with the assistance of a qualified historic architect who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61. Features of the hallway exhibit shall include the control panels, burner fronts, and the floating master gauge in their original location. If the metal panels supporting the burner fronts are destroyed during the demolition of the boilers, new in-kind panels shall be constructed. If the steel columns and beam supporting the floating gauge are destroyed during the demolition of the	City of Pasadena Design and Historic Preservation Section to review draft and final plans and specifications for interpretive architectural exhibit, ensure Applicant consultation with Pasadena Heritage during planning phase for exhibit, and verify inclusion of HABS documentation in exhibit.  City of Pasadena Building and Safety Division to verify completed installation of the interpretive architectural exhibit prior to issuance of certificate of occupancy.	Prior to demolition within the Glenarm Building, Applicant to hire qualified architectural historian, historic architect, or historic preservation professional to prepare plans and specification for interpretive exhibit, including HABS documentation.  Following demolition and prior to commencing construction within the Glenarm Building. Applicant to prepare final plans and specifications for the interpretive architectural exhibit that address construction of	Prior to City's issuance of demolition permits for the Glenarm Building. Design and Historic Preservation Section to review and approve draft plans and specifications for interpretive architectural exhibit, ensure Applicant consultation with Pasadena Heritage during planning phase for exhibit, and confirm the inclusion of HABS documentation.  Prior to City's issuance of the certificate of occupancy for the Glenarm Building. Design and Historic Preservation Section to review and approve final plans and specifications for interpretive exhibit, including any new			

Table 4-1 (Continued)

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Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
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<p>burners, new in-kind supports for the gauge shall be constructed. HABS photos taken before the demolition of the burners shall be displayed as part of the exhibit. Issuance of the certificate of occupancy for the Glenarm Building shall be conditioned on the completed installation of the interpretive exhibit.</p> <p>During the planning phase for the interpretive exhibit, the Applicant shall ensure Pasadena Heritage is consulted and give the opportunity to provide input into the plans and specifications before they are finalized.</p>		new, in-kind burner front panels and floating gauge supports, if needed.	construction, and verify completed installation.			
<p><b>Mitigation Measure CULT-3: Demolition Monitoring.</b> Due to the complexity of the demolition of the burners, potential damage may occur to historic character-defining features of the Glenarm Building. The proposed project shall be designed to avoid the potential for damage to historic fabric and features. Demolition plans shall be prepared for the proposed project by a qualified historic architect. The project shall also be conditioned to require demolition and construction monitoring by a qualified historic architect, to ensure full conformance to the Standards with regard to the proposed project, and to ensure that the appropriate preservation treatment for any unanticipated preservation issues</p>	<p>City of Pasadena Design and Historic Preservation Section to verify Applicant’s retention of a qualified preservation consultant to review and approve demolition plans for, and monitor demolition and construction within, the Glenarm Building;, and to verify Applicant retention of a qualified historic architect and qualified historic engineer during the planning phase for seismic retrofitting of the Glenarm Building.</p>	<p>Prior to commencing demolition and construction, Applicant to retain qualified preservation consultant to review demolition plans for the Glenarm Building and serve as construction monitor during Glenarm Building demolition and construction.</p>	<p>Prior to City’s issuance of demolition and construction permits for the Glenarm Building. Design and Historic Preservation Section to verify with Applicant that historic architect has prepared demolition plans; that historic architect has been retained for demolition and construction monitoring; and that historic architect and historic engineer have been for planning phase of seismic retrofitting of the Glenarm Building.</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
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encountered during demolition/construction is properly completed.	City of Pasadena Planning Division (Zoning Administrator) to review demolition and construction monitoring reports.					
<p>In addition, a qualified historic architect and qualified historic engineer shall be retained by the Applicant to consult during the planning phase for seismic retrofitting of the Glenarm Building necessary for designation of the building as an essential facility.</p> <ul style="list-style-type: none"> <li>The demolition plan shall include a protection plan that details procedures, materials, and sequence of operations necessary to protect existing materials from damage.</li> <li>Protection shall be provided to existing historic materials wherever encountered adjacent to proposed demolition or construction work to prevent damage to or marring of materials, surfaces, and finishes. Such protection shall be of sufficient size and thickness to withstand impact from falling debris; rolling objects such as equipment, machinery and handcarts; movement of</li> </ul>	City of Pasadena Planning Division (Zoning Administrator) to verify receipt of all construction monitoring reports.	For the duration of Glenarm Building demolition and construction activities, Applicant is responsible for ensuring construction monitor regularly performs monitoring and submits required monitoring reports to the City to demonstrate ongoing compliance.	Throughout Glenarm Building demolition and construction phases, Design and Historic Preservation Section to verify construction monitoring is conducted and demolition and construction monitoring reports submitted by Applicant at the required weekly intervals and 50 percent/100 percent completion milestones.			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
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<p>materials and debris; and residue from flame cuttings such as sparks.</p> <ul style="list-style-type: none"> <li>The demolition plan shall be completed prior to the issuance of demolition and construction permits for the project.</li> <li>Demolition and construction monitoring by a historic architect shall occur on a weekly basis and the historic architect shall prepare and submit reports with photographs of the work at 50 percent and 100 percent completion milestones for each phase, respectively.</li> </ul>						
<p><b>Mitigation Measure CULT-4: Archaeological Resources Treatment.</b>                      If archaeological resources are encountered during project implementation, an archaeologist meeting the Secretary of the Interior’s Professional Qualification 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> <p>The archaeologist shall 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</p>	City of Pasadena Planning Division (Zoning Administrator)	During grading and excavation, in the event that archaeological resources are encountered, Applicant to notify Planning Division and retain a qualified archaeologist to implement this mitigation measure.	If notified by Applicant of the presence of archaeological resources during construction, Planning Division to verify Applicant retention of qualified archaeologist for implementation of this mitigation measure.  Following project grading and excavation and prior to project construction, Planning Division to review and approve final report submitted by Applicant or qualified			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
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<p>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 shall 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 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 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.</p> <p>If warranted, the archaeologist will develop a monitoring program in coordination with a Native American</p>			archaeologist.			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
		Applicant Implementation	Agency Enforcement	Initial	Date	Remarks
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><b>Mitigation Measure CULT-5:</b> Paleontological Resources Treatment. 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 deposits 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 deposits, no further measures need be taken. The frequency of monitoring inspections shall be based on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered.</p>	City of Pasadena Planning Division (Zoning Administrator)	During grading and excavation, in the event that paleontological resources are encountered, Applicant to notify Planning Division and retain a qualified paleontologist to implement this mitigation measure.	<p>If notified by Applicant of the presence of paleontological resources during grading and excavation, Planning Division to confirm Applicant retention of qualified paleontologist for implementation of this mitigation measure.</p> <p>Following project grading and excavation and prior to project construction, Planning Division to confirm receipt of final report from Applicant or qualified paleontologist.</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
		Applicant Implementation	Agency Enforcement	Initial	Date	Remarks
<p>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. 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. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. 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.</p> <p>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 applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the</p>						

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
		Applicant Implementation	Agency Enforcement	Initial	Date	Remarks
satisfactory completion of the project and required mitigation measures.						
<p><b>Mitigation Measure CULT-6: Human Remains Treatment.</b></p> <p>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 Descendent 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 <i>CEQA Guidelines</i> 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 Descendent.</p>	City of Pasadena Planning Division (Zoning Administrator)	During grading and excavation, in the event that human remains are encountered, Applicant to notify Planning Division and initiate consultation the NAHC and follow that agency’s recommended course of action to implement this mitigation measure.	<p>If notified by Applicant of the presence of human remains during grading and excavation, Planning Division to confirm Applicant consultation with the NAHC for implementation of this mitigation measure.</p> <p>Following project grading and excavation and prior to project construction, Planning Division to confirm Applicant has completed the NAHC’s recommended course of action.</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
		Applicant Implementation	Agency Enforcement	Initial	Date	Remarks
<b>3. HAZARDS AND HAZARDOUS MATERIALS</b>						
<b>Mitigation Measure HAZ-1:</b> Prior to the issuance of demolition permits, PWP shall submit to the City of Pasadena City of Pasadena Fire Department a comprehensive pre-demolition asbestos survey in accordance with SCAQMD Rule 1403. All identified asbestos-containing materials shall be removed and disposed of by a registered Cal-OSHA-certified asbestos abatement contractor prior to any disturbance of the material, and the Applicant shall submit documentary proof of such handling to the City.	City of Pasadena Fire Department	Prior to demolition, Applicant to submit comprehensive pre-demolition survey.  Following demolition, Applicant to submit proof of asbestos abatement and disposal to Building and Safety Division.	Prior to issuance of demolition permits, demolition, Building and Safety Division to verify receipt of pre-demolition asbestos survey from Applicant.  Prior to construction, Building and Safety Division to verify receipt of proof of asbestos abatement and disposal from Applicant.			
<b>Mitigation Measure HAZ-2:</b> Prior to issuance of demolition permits, PWP shall submit to the City of Pasadena Fire Department a lead-based paint survey for all existing buildings located on the project site. All identified lead-based paint shall be handled and disposed of pursuant to OSHA regulations, and the Applicant shall submit documentary proof of such handling to the City.	City of Pasadena Fire Department	Prior to demolition, Applicant to submit comprehensive pre-demolition survey.  Following demolition, Applicant to submit proof of lead-based paint abatement and disposal to Building and Safety Division.	Prior to demolition, Building and Safety Division to verify receipt of pre-demolition lead-based paint survey from Applicant.  Prior to issuance of building permit(s), Building and Safety Division to verify receipt of proof of lead-based paint abatement and disposal from Applicant.			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
		Applicant Implementation	Agency Enforcement	Initial	Date	Remarks
<p><b>Mitigation Measure HAZ-3:</b> Shallow soil contamination at the proximity of GP32 (total lead concentration of 1,400 ppm at 1.5 feet bgs), as indicated in the Phase II Environmental Site Assessment, shall be excavated and disposed of off-site. The lateral extent of the remedial excavation may extend to GP-31, GP-33, and BH-7. The vertical extent of remedial excavation is anticipated to be less than 5 feet. In addition, if the soil at the vicinity of the above-mentioned locations is planned for off-site disposal, then the excavated soil shall be stockpiled and a WET test shall be made on stockpile soil samples to determine the soluble lead concentration of the stockpiled soil for soil disposal purposes.</p>	City of Pasadena Fire Department	During grading and excavation, Applicant to implement this mitigation measure.	Prior to the commencement of construction, Building and Safety Division to verify Applicant compliance with this mitigation measure.			
<p><b>Mitigation Measure HAZ-4:</b> If the soil at the vicinity of the locations (as identified in the Phase II Environmental Site Assessment) where TRPH concentrations exceed 1,000 ppm is planned for off-site disposal, then the excavated soil shall be stockpiled and analytically tested for TPH and VOCs using EPA Method 8015 M and 8260B or per soil disposal facility requirements.</p>	City of Pasadena Fire Department	During grading and excavation, Applicant to implement this mitigation measure.	Prior to the commencement of construction, Building and Safety Division to verify Applicant compliance with this mitigation measure.			
<p><b>Mitigation Measure HAZ-5:</b> During project design development and prior to initiation of excavation and grading activities, PWP shall retain a qualified</p>	City of Pasadena Fire Department	During project design development and prior to excavation and grading, Applicant to retain	Prior to the commencement of grading and excavation, Building and Safety Division to			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
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<p>environmental consultant to prepare a soils management plan that shall be submitted to the City of Pasadena Fire Department for review and approval. The soils management plan shall be implemented during excavation and grading activities on the project site to ensure that any contaminated soils are properly disposed of offsite. The plan shall include, but not necessarily be limited to the following:</p> <ul style="list-style-type: none"> <li>• A qualified environmental consultant shall be present as necessary during excavation or grading activities to monitor compliance with the soils management plan and to actively monitor the soils and excavations for evidence of contamination.</li> <li>• Any soil encountered during excavation or grading activities that appears to have been affected by hydrocarbons or any other contamination shall be evaluated, based upon appropriate laboratory analysis, by a qualified environmental consultant prior to offsite disposal at a licensed facility.</li> <li>• Soils in the southwestern corner of the site near Boring Location GP32 and where TRPH concentrations exceed 1,000 ppm, as identified in the Limited Phase II ESA, shall be segregated and analyzed prior to</li> </ul>		<p>qualified consultant to prepare soils management plan and submit plan to Building and Safety Division for approval.</p> <p>During grading and excavation, Applicant to implement approved soils management plan. Upon completion of grading and excavation, Applicant to notify Building and Safety Division of completion of implementation of soils management plan.</p>	<p>review and approve soils management plan.</p> <p>Following grading and excavation and prior to construction, Building and Safety Division to verify completion of implementation of soils management plan.</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Monitoring or Enforcement Agency	Timeframes for Mitigation Implementation & Enforcement		Verification of Compliance		
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offsite disposal. This may require over-excavation in these area and further analysis of this soil to determine the extent of soil contamination. <ul style="list-style-type: none"> <li>All identified contaminated soils shall be properly handled and transported to an appropriately licensed disposal facility.</li> </ul>						



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