

III. Responses to Comments



III. Responses to Comments

A. Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments." In accordance with these requirements, this section of the Final EIR provides the responses prepared by the City of Pasadena (City) to each of the written comments received regarding the Draft EIR. Topical responses have been prepared to address commonly raised topics. These topical responses are provided in Section III.B, Topical Responses, of this section of the Final EIR and include the following:

Topical Response No. 1: Compressed Natural Gas Fueling Facility

Topical Response No. 2: Solar Panels

Section III.C, Matrix of Comments Received in Response to the Draft EIR, includes a table that provides a summary of the environmental issues raised by each commenter in response to the Draft EIR. Section III.D, Comment Letters and Responses, provides responses to each of the written comments raised regarding the Draft EIR, as well as oral comments raised during the Planning Commission meeting held during the public review period of the Draft EIR. Copies of the original comment letters are provided in Appendix FEIR-1 of this Final EIR.

III. Responses to Comments

B. Topical Responses

Topical Response No. 1: Compressed Natural Gas Fueling Facility

As discussed in Section III. Project Description of the Draft EIR, a Compressed Natural Gas (CNG) fueling facility may potentially be constructed near the new Commuter Services and Facilities Hub at the expanded South Building within the Hillside Campus or within the mobility hub area of the South Campus. Multiple commenters raised concerns regarding the potential siting of a CNG fueling facility at the Hillside Campus. Natural gas is an environmentally clean, plentiful, low-cost, domestically produced fuel that is used in millions of residences and businesses throughout the U.S. and as a transportation fuel for motor vehicles. Any fuel, including those used in motor vehicles, can be dangerous if handled improperly. Fuels contain energy, which is released when the fuel is ignited. Gasoline is a potentially dangerous fuel; however, by understanding how to handle it, it has been used safely for more than a century. The same is true of natural gas.¹

Natural gas is fuel that occurs naturally and requires very little processing before use. Chemically, it normally consists of over 90 percent methane with smaller amounts of ethane, propane, butane, carbon dioxide, and other trace gases. Pure methane has a very high octane rating (120-130), and the high methane content of natural gas, in turn, gives natural gas this same attribute. The low carbon content of methane also allows for the potential of low carbon and greenhouse gas (GHG) emissions.²

As with all vehicle fuels, natural gas can be used safely if the unique properties of the fuel are understood and common sense procedures are followed. In fact, natural gas has safety advantages compared to gasoline and diesel in that it is non-toxic and has no potential for ground or water contamination in the event of a fuel release. According to the U.S. Department of Energy's Alternative Fuels Data Center, natural gas vehicles are

¹ *Clean Vehicle Education Foundation, Technology Committee Bulletin, How Safe are Natural Gas Vehicles, September 28, 1999 and revised September 17, 2010.*

² *Clean Vehicle Education Foundation, Technology Committee Bulletin, How Safe are Natural Gas Vehicles, September 28, 1999 and revised September 17, 2010.*

actually safer than those powered by gasoline or diesel.³ Natural gas is lighter than air and dissipates rapidly when released. The fact that natural gas is lighter than air further enhances its safety. Fuels such as diesel, gasoline, or liquefied propane gas/propane autogas, which are heavier than air, pool on the ground, creating a fire hazard. If a compressed natural gas leak should occur, the gas will disperse rapidly upwards into the atmosphere and dissipate. In addition, compressed natural gas has a high ignition temperature of approximately 1,200 degrees Fahrenheit compared with approximately 600 degrees Fahrenheit for gasoline. Natural gas also has a very limited range of flammability as it will not burn in concentrations below approximately 5 percent or above 15 percent when mixed with air. Gasoline and diesel burn at much lower concentrations.⁴ The high ignition temperature range and limited flammability range make the accidental combustion of CNG unlikely.

An odorant is also added to provide a distinctive and intentionally disagreeable smell that is easy to recognize in the event of an unexpected leak. According to a safety article in the Natural Gas Vehicle Knowledge Base, the average person can detect odorized natural gas at concentrations as low as 0.3 percent.⁵ As discussed above, for combustion to occur, natural gas requires a concentration of at least five percent. Thus, personnel will detect the smell long before combustion conditions are met.

Natural gas has been distributed safely for years. In most circumstances and as with the Project, it is delivered via underground pipeline networks, the same networks that deliver natural gas to residences and businesses. At a CNG fueling station, natural gas is distributed by compressed natural gas modules and tube trailers, designed to approved standards for delivery.⁶ The natural gas is compressed before being provided to vehicles at 3,000 to 3,600 pounds per square inch (psi). Stations can deliver a “fast fill” to vehicles in minutes or, using a “slow fill” strategy, in a few hours to overnight. Although the use of high storage pressures might appear dangerous, compression, storage, and fueling of natural gas vehicles are required to meet stringent industry and government safety

³ U.S. Department of Energy, Office of Energy Efficiency & Renewable Energy, *Compressed Natural Gas Vehicle Maintenance Facility Modification Handbook* (Sept. 2017) www.afdc.energy.gov/uploads/publication/cng_maintenance_facility_mod.pdf, accessed April 10, 2018.

⁵ Rob Minton, *Dispelling CNG Safety Myths* (Sept. 2015) www.automotive-fleet.com/channel/green-fleet/article/story/2015/09/dispelling-cng-safety-myths.aspx, accessed April 10, 2018.

⁵ Rob Minton, *Dispelling CNG Safety Myths* (Sept. 2015) www.automotive-fleet.com/channel/green-fleet/article/story/2015/09/dispelling-cng-safety-myths.aspx, accessed April 10, 2018.

⁶ NGV Global, *Natural Gas Vehicle Safety*, available at www.iangv.org/natural-gas-vehicles/naturally-safe/, accessed on January 4, 2018.

standards.⁷ More specifically, National Fire Protection Association (NFPA) 52 Vehicular Gaseous Fuel Systems Code applies to the design, installation, and maintenance of CNG engine fuel systems on vehicles of all types and to their associated fueling (dispensing) facilities and storage.⁸

With regard to the high pressure storage of compressed natural gas, CNG fuel cylinders are significantly stronger than gasoline tanks. Natural gas fuel tanks are up to a half-inch thick and are made of steel or a composite designed to be stronger than steel, and valves are made to handle high pressure.^{9, 10} In addition, the design of CNG cylinders is subject to a number of “severe abuse” tests such as heat and pressure extremes, gunfire, collisions, and fire. The systems are also fitted with valves and other safety devices to prevent leakage and eliminate the risk of an explosion¹¹

The proposed CNG facility would connect with existing natural gas lines and would not require delivery of natural gas via trucks. Overall, all of the components of the CNG facility, including the lines, pumps, and dispensers would be designed, constructed and operated in compliance with applicable codes, including the above from the NFPA as well as the Pasadena Municipal Code (PMC), the International Fire Code (IFC), the International Mechanical Code (IMC) and California Fire Code (CFC). As part of these code requirements, the CNG facility would incorporate fire protection equipment and safety features, such as installation of electrical wiring in a manner that does not provide a source of ignition due to sparking, and use of automatic shut-off valves and other devices so that the equipment is designed to be “explosion proof.” In addition, the CNG facility would be reviewed and approved by the Pasadena Fire Department (PFD). Compliance with regulatory requirements would ensure safety during the operation of the fueling station and the storage of CNG.

⁷ *Clean Vehicle Education Foundation, Technology Committee Bulletin, How Safe are Natural Gas Vehicles, September 28, 1999 and revised September 17, 2010.*

⁸ *National Fire Protection Association 52 Vehicular Gaseous Fuel Systems Code, 2016.*

⁹ *SoCalGas, Natural Gas Vehicles for Business—Safety and Cylinder Inspection www.socalgas.com/for-your-business/natural-gas-vehicles/safety-and-cylinder-inspection, accessed April 10, 2018.*

¹⁰ *U.S. Department of Energy, National Energy Technology Laboratory, CNG Fuel System Inspector Study Guide, www.afdc.energy.gov/pdfs/cng_inspector_study_guide.pdf, accessed April 10, 2018.*

¹¹ *Rob Minton, Dispelling CNG Safety Myths (Sept. 2015), www.automotive-fleet.com/channel/green-fleet/article/story/2015/09/dispelling-cng-safety-myths.aspx, accessed April 10, 2018.*

Topical Response No. 2: Solar Panels

As discussed in Section II. Project Description of the Draft EIR, the Project includes the installation of photovoltaic (PV) solar cells on the rooftop of the buildings within the South Campus and as canopies over an existing surface parking areas within the North Lot and South Lot within the Hillside Campus. The solar canopies would provide shade while decreasing thermal absorption and generating power. The coverage area of the canopies would comprise approximately 40 percent of each lot. In addition, the maximum height for the canopies would be 20 feet.

As described in Section IV.A Aesthetics of the Draft EIR, the Hillside Campus has limited visibility from the surrounding area due to a dense tree cover along the northern and eastern boundaries of the campus and the topography of the area that naturally blocks views from the west and south toward the Hillside Campus. Thus, the solar canopies within the North and South Lots would not be visible from adjacent public rights-of-way, such as Lida Street, or from the immediately adjacent residential area to the north (i.e., along Pegfair Estates Drive). The solar canopies within the North and South Lots may be visible from private residential properties that are higher in elevation. However, these areas are located approximately 0.4 miles from the North and South Lots. Given this distance and existing and proposed landscaping within the South Campus, perceptible views of the solar panels within the North and South Lots would be limited.

According to the U.S. Department of Energy's Office of Energy Efficiency & Renewable Energy (EERE), a common misconception about solar PV panels is that they inherently cause or create "too much" glare, posing a nuisance to neighbors. While in certain situations the glass surfaces of solar PV systems can produce glint (a momentary flash of bright light) and glare (a reflection of bright light for a longer duration), light absorption (rather than reflection) is central to the function of solar PV panels to absorb solar radiation and convert it to electricity.¹² Any reflected sunlight, after all, is lost energy production potential. Solar PV panels are constructed of dark-colored (usually blue or black) materials and are covered with anti-reflective coatings. Modern PV panels reflect as little as 2 percent of incoming sunlight, about the same as water and less than soil or even wood shingles. Solar panels reflect less sunlight than concrete, vegetation, bare soil and even wood shingles. Thus, modern solar panels do not produce substantial light and glare.¹³ In addition, given the basic tenants of light reflectivity, the angle of reflected

¹² U.S. Department of Energy, Office of Energy Efficiency & Renewable Energy, *Solar PV and Glare Factsheet*, based on Meister Consultants Group, *Solar and Glare*, June 2014.

¹³ Colton, Roger, *Evaluating Glare from Roof Mounted PV Arrays* (2015), <http://solarprofessional.com/articles/design-installation/evaluating-glare-from-roof-mounted-pv-arrays/page/0/1#.WsgPZYgbO00>, accessed April 10, 2018

sunlight is likely to be directed sufficiently skyward.¹⁴ Some of the concern and misconception is possibly due to confusion between solar PV systems and concentrated solar power (CSP) systems. CSP systems typically use an array of mirrors to reflect sunlight to heat water or other fluids to create steam that turns an electric generator. These typically involve large ground-mounted reflectors, usually in remote desert locations, and are not installed in residential or commercial areas. A CSP system is not proposed.

In addition to the refractive/reflective properties of solar glass versus standard glass, many PV suppliers use stippled solar glass for their PV panels. The basic concept behind stippling is for the surfaces of the glass to be “textured” with small types of indentations. As a result, stippling allows more light energy to be channeled/transmitted through the glass while diffusing (weakening) the reflected light energy.¹⁵ In addition, it is important to note that the proposed PV panels would be located in areas that are currently used for surface parking where windshield glass is a source of glare that is greater than that of a solar panel. As such, incorporation of the solar canopies within the North and South Lots would generate less glare when compared with the glare from the windshield glass that occurs when the lots are fully occupied under existing conditions. Overall, considering the limited visibility of the North and South Lots resulting from distance, topography, and existing and proposed landscaping, together with the anti-reflective properties of the solar panels, significant impacts associated with glare would not occur.

¹⁴ Colton, Roger, *Assessing Rooftop Solar PV Glare in Dense Urban Residential Neighborhoods: Determining Whether and How Much of a Problem* (2014), www.fsconline.com/downloads/Papers/2014%2011%20Solar_Glare.pdf, accessed April 11, 2018,

¹⁵ Sunpower Corporation, *PV Systems: Low Levels of Glare and Reflectance vs. Surrounding Environment*, 2010; Colton, Roger D., *Assessing Rooftop Solar PV Glare in Dense Residential Neighborhoods*, November 16, 2014.

III. Responses to Comments

C. Matrix of Comments Received in Response to the Draft EIR

Table III-1
Matrix of Comments Received in Response to the Draft EIR

LETTER No.	COMMENTER	EXECUTIVE SUMMARY	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS/ AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL AND TRIBAL CULTURAL RESOURCES	GEOLOGY AND SOILS	GREENHOUSE GAS EMISSIONS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY AND WATER QUALITY	LAND USE	NOISE	FIRE PROTECTION	TRAFFIC/PEDESTRIAN SAFETY	WATER SUPPLY AND INFRASTRUCTURE	WASTEWATER	SOLID WASTE	ENERGY	CNG FACILITY	PV CELLS AND CANOPIES	ALTERNATIVES	CUMULATIVE IMPACTS	GENERAL/OTHER	SUPPORT	
STATE AND REGIONAL																										
1	Alan Lin, Project Coordinator District 7, Office of Transp. Planning California Dept. of Transportation 100 S. Main Street, MS 16 Los Angeles, CA 90012-3727 Miya Edmonson, IGR/CEQA Acting Branch Chief District 7 California Dept. of Transportation 100 S. Main Street, MS 16 Los Angeles, CA 90012-3727				X				X		X				X											

Table III-1 (Continued)
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2	Gayle Totton, Associate Governmental Program Analyst Native American Heritage Commission 1550 Harbor Boulevard., Suite 100 West Sacramento, CA 95691-3830						X																		
3	Jack Cheng, Air Quality Specialist SCAQMD 21865 Copley Drive Diamond Bar, CA 91765-4178 Lijin Sun, Program Supervisor CEQA Inter-Governmental Review Planning, Rule Develop. & Area Sources SCAQMD 21865 Copley Drive Diamond Bar, CA 91765-4178				X																				

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4	Eddi Zepeda, Transportation Planner Countywide Planning & Development, Joint Development Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, MS 99-23-4 Los Angeles, CA 90012-2952 Derek Hull, Manager Transportation Planning Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, MS 99-23-4 Los Angeles, CA 90012-2952		X												X							X		X	
5	Adriana Raza Will Serve Program Facilities Planning Department Sanitation Districts of Los Angeles County 1955 Workman Mill Road Whittier, CA 90601-1415																X								

Table III-1 (Continued)
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ORGANIZATIONS																										
6	Barbara Goto, Director of Operations Arroyos & Foothills Conservancy P.O. Box 1 Pasadena, CA 91102-0001 John Howell, Chief Executive Officer Arroyos & Foothills Conservancy P.O. Box 1 Pasadena, CA 91102-0001					X																				
7	John Howell Chief Executive and General Counsel Arroyos & Foothills Conservancy P.O. Box 1 Pasadena, CA 91102-0001 Barbara Goto Director of Operations Arroyos & Foothills Conservancy P.O. Box 1 Pasadena, CA 91102-0001					X																				

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8	Nina Chomsky, President Linda Vista–Annandale Association P.O. Box 94364 Pasadena, CA 91109-4364		X	X	X	X						X			X						X	X	X		X		
9	Brian Berger, President Mirador Ranch Homeowners Association 1460 Rutherford Drive Pasadena, CA 91103-2773		X																	X							
INDIVIDUALS																											
10	Teresa Anderson-Dvoracek 1575 Knollwood Terrace Pasadena, CA 91103-1909		X												X						X					X	
11	Barbara Blake babsblake2@gmail.com		X		X										X						X					X	
12	Nina Briggs ninabriggsis@gmail.com																			X		X					
13	John Callas 1560 Scenic Drive Pasadena, CA 91103-1937				X										X											X	

Table III-1 (Continued)
Matrix of Comments Received in Response to the Draft EIR

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14	Gennia Cui thegennia@gmail.com														X					X				X	
15	Joanna Davies jdavies@usc.edu																			X					X
16	Maria & Joseph F. DiMassa jfdimassa@gmail.com		X	X	X															X	X			X	
17	Donna & Douglas Gerry 1519 Arroyo View Drive Pasadena, CA 91103-1904																			X	X			X	
18	Steve Handy stevedhandy@gmail.com		X																					X	
19	Mic Hansen mic.hansen@icloud.com				X										X										
20	Patricia Hill trish0@dslextreme.com									X					X					X	X				
21	Darlene Hubanks dhubanks@aol.com																			X					
22	Nanette Karapetian nanettek321@gmail.com		X																					X	

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23	Tim Martinez 1404 Chamberlain Road Pasadena, CA 91103-2312					X																		X		
24	Patricia Wells McMillan pwellsmc@gmail.com		X												X										X	
25	Debbie Mitchell 1199 Yocum Street Pasadena, CA 91103-1944		X												X					X					X	
26	Robert Morris 1192 Rancheros Place Pasadena, CA 91103-2753								X																X	
27	Jim O’Kane jvokane@gmail.com																								X	
28	Jim O’Kane jvokane@gmail.com																							X	X	
29	Kathleen O’Kane oakgrove@pacbell.net														X					X						

Table III-1 (Continued)
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30	<p>[Late Comments] Joseph F Paggi Jr 747 S Madison Ave Pasadena, CA 91106 joepaggi@me.com</p> <p>Sharon Freark sharon@success-reps.com</p>									X					X												
COMMENTS RAISED AT THE PLANNING COMMISSION MEETING																											
31	Chair Tim Wendler Commissioner Patricia Keane Commissioner Felicia Williams Commissioner Michael Williamson Commissioner Ali Barar Commissioner Donald Nanney Commissioner David Coher Barbara Nanney (Public Speaker) Maria Lopez (Public Speaker) Nina Chomsky (Public Speaker)		X		X																						

III. Responses to Comments

D. Comment Letters and Responses

Comment Letter No. 1

Alan Lin, Project Coordinator
District 7, Office of Transportation Planning
California Department of Transportation
100 S. Main Street, MS 16
Los Angeles, CA 90012-3727

Miya Edmonson, IGR/CEQA Acting Branch Chief
District 7
California Department of Transportation
100 S. Main Street, MS 16
Los Angeles, CA 90012-3727

Comment No. 1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The ArtCenter College of Design (Art Center) proposes a 15-year Master plan (the Project) that focuses growth on its campus. It is anticipated that upon completion of the project, total enrollment within Art Center would increase from its current enrollment of approx. 2,000 full-time equivalent (FTE) students to a maximum of 2,500 FTE students and increase faculty/staff from 753 faculty/staff members to approx. 994 faculty/staff members between the two campuses.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

Response to Comment No. 1-1

This introductory comment, which provides a summary of the Project and Caltrans' mission, does not address the content or adequacy of the Draft EIR. However, it is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 1-2

Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

Response to Comment No. 1-2

In 2015, the Pasadena Department of Transportation (DOT) developed and adopted its Transportation Impact Analysis Current Practice and Guidelines (TIA Guidelines) to implement SB 743 by using a set of performance measures, including VMT, as the primary metric for identifying the transportation impacts of proposed development projects. As discussed on page IV.L-4 in Section IV.L, Traffic, of the Draft EIR, these performance measures assess the quality of walking, biking, transit, and vehicular travel in the City. A combination of vehicular and multimodal performance measures are employed to evaluate system performance in reviewing new development projects. Such measures include VMT per Capita, Vehicle Trips (VT) per Capita, Proximity and Quality of the Bicycle and Transit Network, and Pedestrian Accessibility.

Comment No. 1-3

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and

achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

Response to Comment No. 1-3

The Project would incorporate Project Design Features L-1 through L-3, which include incorporation of a mobility hub to support multi-modal transportation, a Cycleway to enhance campus circulation, and an increase in the frequency of shuttles between the two campuses. These and other design features of the Project would: (1) encourage walking, biking, and transit use; (2) ensure accessibility and provide a compatible transition to adjoining neighborhoods; and (3) create multimodal features and pedestrian/bicycle facilities that encourage other alternatives to motor vehicles. Specifically, the Metro Gold Line bisects the South Campus with the Fillmore Street Station located 300 feet north of the South Campus. In addition, the Project area is currently served by Pasadena Transit, Metro, and ArtCenter shuttles, which would continue to run between the Hillside Campus and the South Campus, as detailed in Section IV.L, Traffic, of the Draft EIR. Furthermore, the Project would provide short- and long-term bicycle parking spaces, in addition to bicycle-serving amenities, that would further encourage biking. Additionally, the Project design would increase pedestrian accessibility, which would further encourage walkability.

Comment No. 1-4

After reviewing the Draft Environmental Impact Report for this project, Caltrans has the following comments:

By 2032 with Phase 1 plus Phase 2 build out year, the project, after TDM strategies credit, will generate a net 3,061 ADT, 260/248 AM/PM peak hour trips. On page 16 of the Transportation Impact Analysis, prepared on May 8, 2017, for the 2035 General Plan scenario, the incremental change (existing + project) is 22.1 Project VMT Per Capita comparing to the 2013 Significant Impact Threshold 22.6 Project VMT Per Capita. Potential significant impact would be reached if no mitigation is planned. We recommend the City to consider more TDM strategies for the project such as more online courses, more student and faculty/staff member housing, and providing more public transportation, etc. so the impact can be mitigated without raising VMT per capita.

Response to Comment No. 1-4

The 2013 significant impact threshold is reached if a project generates a VMT per Capita greater than 22.6. According to page 16 of the Transportation Impact Analysis, the

Project would result in a lower VMT per Capita than the threshold (i.e., a reduction in Project VMT per Capita), which is not a potentially significant impact as asserted by the commenter.

Nonetheless, the City recognizes the value of increased TDM strategies. In particular, with the addition of student housing within the South Campus, the Project would reduce vehicle miles traveled as there are currently no student housing opportunities within the South Campus. In addition, the Project includes a mobility hub to support multi-modal transportation, a Cycleway to enhance campus circulation, and an increase in the frequency of shuttles between the two campuses. These and other design features of the Project would encourage other alternatives to motor vehicles and reduce vehicle miles traveled.

Comment No. 1-5

From the Master Plan, it appears that the project intends to erect a digital art display that is visible from the National Highway System (NHS), S Arroyo Parkway and E Glenarm St. As a reminder, any advertising structure visible from the NHS is subject to the provisions of the California Outdoor Advertising Act (OAA) outlined in Business and Professions Code Section 5200 et seq. In addition, any advertising structure that displays off-premise commercial copy visible from the NHS will require a permit from the Office of Outdoor Advertising (ODA). You may contact the Area Manager when the project meets the requirements.

George Anzo Jr—Southern Area Manager

Office of Outdoor Advertising
Division of Traffic Operations
Department of Transportation
100 South Main Street
Los Angeles, CA 90012
Office: (213) 897-4208
Cell: (213) 435-1951
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Website: <http://www.dot.ca.gov/trafficops/oda/>

However, so long as this digital art display does not engage in the business of outdoor advertising as defined in Business and Professions Code Section 5300, it will not be considered an advertising structure as defined in Business and Professions Code Section 5203 and will not require a permit from ODA.

Response to Comment No. 1-5

Section IV.L, Traffic, of the Draft EIR, acknowledged the requirements of the California Outdoor Advertising Act. However, as described in Section II, Project Description, of the Draft EIR, the digital gallery would display artwork from ArtCenter's array of programs and would be chosen for display by Department Chairs and faculty in a curated exhibit periodically during the year. Images may represent the wide array of artwork and conceptual designs, including, for example, character animation, storybook illustrations, photographic portraits, short film clips, traditional fine art, motion graphics, multimodal transportation design systems, and wearable technology. Alternatively, ArtCenter may commission individuals to create site-specific work for display, which may include interaction design, moving illustrations, or multimedia artworks. No off-premise outdoor commercial advertising would be displayed. Nonetheless, should the displays ever become outdoor advertising, the Applicant would be required to comply with all regulatory and permitting requirements at that time.

Comment No. 1-6

Since the south campus is at the end of the freeway 110, please also be reminded that any work performed within the State Right-of-way [sic] will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

Response to Comment No. 1-6

This comment notes, in general, the need to obtain an Encroachment Permit from Caltrans for any work performed within the state right-of-way but does not raise any specific, substantive issues on the content or adequacy of the Draft EIR. Nonetheless, ArtCenter would be required to comply with applicable Caltrans requirements, and a Caltrans Encroachment Permit will be sought if any construction activities would encroach on Arroyo Parkway during Project construction. An additional bullet has been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to include this Caltrans Encroachment Permit in the list of permits and approvals. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 1-7

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. The construction time schedule of working hours should be considered off peak

hours for the large size truck trips to minimize traffic congestion and to provide maximum safety to the pedestrians and vehicular traffic on the streets and freeways.

Response to Comment No. 1-7

This comment notes, in general, the need to obtain a permit from Caltrans for oversized transport vehicles to use state highways and recommends that large truck trips be limited to off peak hours but does not raise any specific, substantive issues on the content or adequacy of the Draft EIR. Nonetheless, ArtCenter would be required to comply with applicable Caltrans requirements, and a Caltrans transportation permit will be sought for the use of oversized-transport vehicles on state highways. An additional bullet has been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to include this Caltrans transportation permit in the list of permits and approvals. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 1-8

Storm water run-off is a sensitive issue for Los Angeles. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

Response to Comment No. 1-8

The comment notes, in general, the importance of compliance with storm water management laws and regulations but does not comment on any issue related to the Draft EIR. It should be noted that the Project would be required to comply with all applicable regulatory requirements regarding stormwater, as discussed in detail in Section IV.H, Hydrology and Water Quality, of the Draft EIR, and would not discharge stormwater onto State highway facilities. While the comment does not address content or adequacy of the Draft EIR, this comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 2

Gayle Totton
Associate Governmental Program Analyst
Native American Heritage Commission
1550 Harbor Boulevard., Suite 100
West Sacramento, CA 95691-3830

Comment No. 2-1

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Executive Summary with Table 1-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts; the Introduction and Project Description; and the Environmental Impact Analysis, section IV.D Cultural and Tribal Cultural Resources prepared by Eyestone Environmental for the City of Pasadena. We have the following concerns:

1. The definition of consultation as quoted from PRC section 21080.3 (b) cross-referenced to GC section 65352.4 is correct. HOWEVER, the narrative misstates the law, referring to the requirement to consult with only one tribe. Consultation outreach must be conducted with all tribes that have requested notice of projects for the purpose of consultation.
2. While government-to-government consultation by the lead **agency** under AB-52 with ONE Native American tribe traditionally and culturally affiliated to the project area is documented (Gabrieleno [sic] Band of Mission Indians—Kizh Nation), consultation outreach to the other Gabrieleno [sic] tribes (two additional tribes have documentation of letters sent to the City) culturally affiliated to the area is not documented.

Response to Comment No. 2-1

According to City records, the Gabrieleño Band of Mission Indians—Kizh Nation (Kizh Gabrieleños) were the only tribe that requested notice of projects for the purpose of consultation. Upon receipt of this comment letter, the City spoke with the commenter and requested a list of additional interested tribes. The commenter was unable to provide the list of additional tribes, but indicated that those tribes would be asked to submit new letters requesting notice of projects for the purpose of consultation. However, no such letters were received during the preparation of this Final EIR.

Comment No. 2-2

3. Mitigation language for archaeological resources is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources (Refer to Mitigation Measure D-2).

Response to Comment No. 2-2

Mitigation Measure D-2 specifically required a monitor meeting the satisfaction of the Gabrieleño Band of Mission Indians—Kizh Nation to be present on-site during grading and excavation activities. The mitigation measure also required the performance of other special studies, provision of a comprehensive final report, and relinquishing any findings to the tribe, so as not to limit the mitigation to archaeological resources. The comment does not identify any other measures that would be appropriate for the City to consider.

Comment No. 2-3**ADDITIONAL INFORMATION:**

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1: Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

Response to Comment No. 2-3

Impacts to historical resources have been addressed in Section IV.D, Cultural and Tribal Cultural Resources, of the Draft EIR based on a Historical Resources Technical Report (Historical Resources Report) prepared for the Project. As identified in the Draft EIR and the Historical Resources Report, the Project sites include only one historical resource: the Ellwood Building on the Hillside Campus, which has been designated a Pasadena Historic Monument; the Hillside Campus is not located within a historic district or

landmark district. Since the Project does not propose any exterior modifications to the Ellwood Building, an analysis for conformance with the Secretary of the Interior's Standards is not required. In addition, the City of Pasadena has reviewed the Project and determined that the proposed work would not require a Certificate of Appropriateness. The Draft EIR and Historical Resources Report also determined that there are no designated or eligible historical resources elsewhere on the Hillside Campus or within the South Campus. Accordingly, it was determined that there are no historical resources immediately adjacent to either the Hillside Campus or South Campus that would have the potential to be directly or indirectly impacted by the Project. Thus, the Project would have a less-than-significant impact on historical resources as defined by CEQA, and no mitigation was required or recommended.

Comment No. 2-4

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"⁵, that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁶ Public agencies shall, when feasible, avoid damaging affects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

⁸ 154 U.S.C. 300101,36 C.F.R. § 800 at seq.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Response to Comment No. 2-4

The Project would not involve a General Plan or Specific Plan amendment and, thus, is not subject to SB 18 tribal consultation requirements. Similarly, the Project is not a federal undertaking and does not require any federal approvals and, thus, is not subject to NEPA or Section 106 of the National Historic Preservation Act. As discussed in Response to Comment No. 2-1, the City sent a notice for consultation to the one tribe that requested notice of projects for the purpose of consultation. In response to Kizh Nation's concerns regarding possible discovery of tribal cultural resources during ground disturbing activities, the City provided a formal response to the tribe (see Appendix E.5 of the Draft EIR) regarding the inclusion of a mitigation measure (i.e., Mitigation Measure D-2). No further comments from the tribe were received subsequent to the City's formal response.

Comment No. 2-5

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

Response to Comment No. 2-5

Please refer to Response to Comment Nos. 2-1 and 2-4 above. In Kizh Nation's request for consultation, they stated that "[i]n all cases, when the Native American Heritage Commission states there are 'no records of sacred sites in the project area' the NAHC will always refer lead agencies to the respective Native American Tribe because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & Tribal Historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. While the property may be located in an area that has been previously developed, numerous examples can be shared to show that there still is a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities. Please note, if they

haven't been listed with the NAHC, it doesn't mean that they aren't there." Based on this statement, no sacred lands are currently known to existing in the Project area. However, as discussed in Response to Comment No. 2-4, the City included Mitigation Measure D-2 to ensure that impacts to tribal cultural resources are reduced to a less-than-significant level.

Comment No. 2-6

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Attachments:

1. Pertinent Statutory Information (1 page)
2. Process that should be documented in the Tribal Cultural Resources section of your environmental document (2 pages)

Response to Comment No. 2-6

The attachments were included in the commenter's response to the Notice of Preparation (NOP), which was included in Appendix A.3 of the Draft EIR. NAHC's recommendations for conducting cultural resources assessments were considered in the preparation of Section IV.D, Cultural and Tribal Cultural Resources, of the Draft EIR. The comment does not describe what other information was required in the Draft EIR section to support the commenter's assertion that the Project did not comply with tribal consultation requirements.

Comment Letter No. 3

Jack Cheng, Air Quality Specialist
South Coast Air Quality Management District
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Lijin Sun, Program Supervisor
CEQA Inter-Governmental Review
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Comment No. 3-1

Attached are the SCAQMD staff comments on the Draft Environmental Impact Report (DEIR) for the proposed ArtCenter College of Design Master Plan (SCAQMD Control Number: LAC171026-02). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. SCAQMD staff comments are meant as guidance for the Lead Agency and should be reviewed for incorporation into the Final EIR. Please contact me if you have any questions regarding these comments.

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

Response to Comment No. 3-1

This comment serves as an introduction to the commenter's letter regarding the Draft EIR for the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 3-2

Project Description and Air Quality Analysis

The Lead Agency proposes to develop a Master Plan for the ArtCenter College of Design South Campus and Hillside Campus to accommodate the growth of up to 2,500 full-time equivalent students by 2032 (Proposed Project). The Proposed Project would include 475,520 million square feet of new academic facilities, student housing, administrative facilities, parking, and open space. In the Air Quality Section, the Lead Agency quantified

the Proposed Project's construction and operational air quality impacts and compared those impacts to SCAQMD's regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's operational and construction emissions would be less than the SCAQMD's regional and localized CEQA significance thresholds. SCAQMD staff has concerns regarding air quality analysis and potential overlapping operational and construction emissions. Please see the attachment for more information.

Response to Comment No. 3-2

This comment provides a summary of the description of the Project. Note that the City is not proposing to develop the Master Plan. Rather, the City is considering an application for a Master Plan for the ArtCenter College of Design South Campus and Hillside Campus. In addition, the Project would provide a net increase in student enrollment of 500 full-time equivalent students, for a total enrollment of 2,500 students, and not additional student growth of 2,500 students. Also note that the Project does not include 475,520 million square feet of new uses. Rather, the Project includes up to 380 new student housing units and 145,100 square feet of academic and commercial space, or 230 new student housing units and up to 310,100 square feet of academic and commercial space.

SCAQMD's concern regarding potential overlapping operational and construction emissions was considered in the air quality analysis. However, given that the construction and operational emissions presented in the Draft EIR were well below the SCAQMD's regional and localized CEQA significance thresholds, further analysis was not considered necessary. Additional analysis has been conducted to address SCAQMD's concern, and supporting documentation and calculations are included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR. A summary of the conclusions is provided below.

As discussed in Section III, Project Description, of the Draft EIR, the Project would be implemented in two phases, with Phase I occurring in the first five years, although it could be completed as early as 2022, and Phase II occurring between 2022 and 2032. Based on this information, an analysis of Year 2022 (operation of Phase I and beginning construction of Phase II) was selected for the interim year analysis and would include the maximum overlapping construction and operational emissions from the proposed Project. The number of beds provided by each phase was used to proportion operational emissions since the number of beds are directly proportional to the number of students and related vehicular trips. Thus, Phase I (850 beds) would represent approximately 57 percent of the total Project buildout (1,500 beds). Operational emissions for completion of Phase I (Year 2022) were calculated using CalEEMod, and the results demonstrate that operational

emissions would be well below the SCAQMD's regional and localized operational significance thresholds. In fact, emissions would remain well below SCAQMD's regional and localized operational significance thresholds considering complete Project buildout in Year 2022. When factoring in construction emissions associated with beginning of Phase II in Year 2022, combined construction and operational air quality impacts remain below SCAQMD's regional and localized construction significance thresholds.

Comment No. 3-3

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)¹, which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment.

As described in the 2016 AQMP, to achieve NO_x emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The Proposed Project plays an important role in contributing to NO_x and ROG emissions during the overlapping construction and operational phases. Therefore, SCAQMD staff recommends additional mitigation measures to further reduce NO_x and ROG emissions. The attachment also includes comments about the air quality analysis and compliance with SCAQMD rules.

Response to Comment No. 3-3

The comment provides general information regarding SCAQMD's 2016 AQMP and the importance of achieving NO_x emission reductions. The comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

In addition, it is acknowledged that the SCAQMD faces a challenge in meeting ozone attainment in a timely manner and specifically reducing regional NO_x emissions by 45 percent in 2023 and 55 percent in 2031 and beyond. The overall control strategy in the 2016 AQMP is an integral approach relying on fair-share emission reductions from federal, state and local levels. Mobile sources contributed about 88 percent of the region's total NO_x emissions in 2012, and the California Air Resources Board (CARB) and U.S.

Environmental Protection Agency (USEPA), which have primary authority over mobile sources, must ensure mobile sources perform their fair share of pollution reduction responsibilities. As discussed in Section IV.B, Air Quality of the Draft EIR, construction and operation of the Project would not exceed any of the SCAQMD thresholds, including those related to NO_x and ROG emissions. Similarly, as discussed in Response to Comment No. 3-2, above, overlap of construction and operational activities would also not exceed SCAQMD thresholds.

Please refer to Response to Comment No. 3-6 for a discussion of SCAQMD's suggested mitigation measures to reduce regional NO_x emissions.

Comment No. 3-4

Pursuant to California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency shall describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

¹ South Coast Air Quality Management District. March 3, 2017. 2016 Air Quality Management Plan. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

Response to Comment No. 3-4

The comment requests that the City comply with CEQA in responding to SCAQMD's comments and making the findings, if any, that recommended mitigation measures are infeasible but does not address any specific issue in the Draft EIR. As requested, the City's responses to SCAQMD's comments will be sent to the SCAQMD as part of the Final EIR distribution prior to certification of Final EIR. The City, in making the findings for the Project, will comply with the requirements of Section 15091 of the CEQA Guidelines. Since air quality impacts are less than significant, findings regarding the recommended mitigation measures are not required.

Comment No. 3-5**ATTACHMENT****Air Quality Analysis—Overlapping Construction and Operational Impacts**

1. The Lead Agency did not analyze a scenario where construction emissions overlap with operational emissions. When overlapping construction and operational activities are anticipated and reasonably foreseeable during the CEQA review for the Proposed Project, SCAQMD staff recommends that the Lead Agency identify the overlapping years, combine construction emissions with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the level of significance in the Final EIR. In the event that the Lead Agency, after revising the Air Quality analysis, finds that the Proposed Project's air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on suggested potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website².

² South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

Response to Comment No. 3-5

As discussed above in Response to Comment No. 3-2, additional analysis has been conducted to address SCAQMD's concern, and supporting documentation and calculations are included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR. Project-related emissions would remain well below SCAQMD's regional and localized operational significance thresholds considering complete Project buildout in Year 2022 even though only Phase I would be contemplated to be completed in Year 2022. When factoring in construction emissions associated with beginning of Phase II in Year 2022, combined construction and operational air quality impacts would remain below SCAQMD's regional and localized construction significance thresholds. As air quality impacts remain less than significant, no mitigation measures would be warranted.

Comment No. 3-6**Additional Recommended Mitigation Measures**

2. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce emissions, particularly from ROG

and NO_x. Additional information on potential mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website³.

- a) All off-road diesel-powered construction equipment shall meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the Lead Agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.
- b) Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 20017 model year NO_x emissions requirements, at a minimum.
- c) Require the use of architectural coatings (no more than 50 grams/liter of VOC) that are in compliance with SCAQMD Rule 1113—Architectural Coatings.
- d) Construct or build with materials that do not require painting or use pre-painted construction materials.
- e) Limit parking supply and unbundle parking costs.
- f) Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles.

Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x and ROG impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

g) Require use of electric lawn mowers and leaf blowers.

³ Ibid.

Response to Comment No. 3-6

As discussed above in Response to Comment No. 3-5, air quality impacts remain less than significant, and as a result the City is not required to impose the requested mitigation measures.

Comment Letter No. 4

Eddi Zepeda, Transportation Planner
Countywide Planning & Development, Joint Development
Los Angeles County Metropolitan Transportation Authority
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Derek Hull, Manager
Transportation Planning
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Comment No. 4-1

Thank you for the opportunity to comment on the Draft EIR for the ArtCenter College of Design Master Plan in the City of Pasadena. Attached is Metro's comment letter, a hard copy of which will follow via mail, as well as the documents referenced in the letter. Please feel free to reach out should you have any questions.

Response to Comment No. 4-1

This comment serves as an introduction to the commenter's attached e-mailed letter regarding the Draft EIR for the Project but does not raise an issue regarding the content or adequacy of the Draft EIR. The comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 4-2

Thank you for the opportunity to comment on the proposed Master Plan for the ArtCenter College of Design for the Notice of Availability of the DEIR. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) in relation to our facilities and services that may be affected by the proposed Master Plan, specifically with regards to improvements planned for the ArtCenter College South Campus located at 870, 888, 950, and 988 S. Raymond Ave. and 1111 S. Arroyo Parkway in the City of Pasadena (Project).

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places

centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro appreciates the opportunity to collaborate with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

To that end, Metro is actively engaged in discussions with the Project sponsor to outline Project design elements that will encourage transit integration for the ArtCenter campus while at the same time ensuring safety measures that will minimize conflicts with rail operations. Metro and the Project sponsor anticipate entering into a Master Agreement which will contemplate and grant certain easements and property rights subject to the satisfaction of certain conditions precedent, including but not limited to the review and approval of engineering plans and construction work plans. Entering into a Master Agreement is subject to additional negotiation of terms and approval by the Metro Board of Directors.

Response to Comment No. 4-2

The commenter states its commitment to collaborate with stakeholders and support the development of transit oriented communities in Los Angeles County, as well as with ArtCenter for the integration of transit use into ArtCenter's South Campus as part of a Master Agreement between Metro and ArtCenter. While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 4-3

Project Description

The Master Plan encompasses development of and comprehensively identifies a vision for both the ArtCenter College's South Campus and Hillside Campus. The majority of the proposed development would occur at the South Campus. The Master Plan for the area would incorporate three newly acquired parcels into the Master Plan Boundary, renovations to existing buildings, demolition of existing buildings and surface parking, construction of new buildings for student housing and other campus uses, development of outdoor quad areas, and construction of a campus cycleway and mobility hub.

Phase I work on the South Campus is planned to occur between 2017 and 2022 and would focus on 950 and 988 S. Raymond Avenue as well as 1111 S. Arroyo Parkway. This work would consist of renovations to the existing building at 950 S. Raymond Avenue and construction of a new 8-story building to include student housing and campus uses on the existing surface parking on 988 S. Raymond Avenue. The existing building on 1111 S.

Arroyo Parkway would be renovated and a new 8-story building that would include student housing and other campus uses would replace the existing surface parking. Phase I also includes construction of a large main quad area bridging the Metro Gold Line and a subterranean tunnel under the Metro Gold Line connecting parking areas. A new mobility hub is included in Phase I, which would include a pick-up/drop-off area, bike parking, and a car sharing fleet.

Phase II work on the South Campus would occur between 2022 and 2032 and take place on 870 and 888 S. Raymond Avenue. The existing surface parking and building at 888 South Raymond Avenue, as well as the surface parking at 870 S. Raymond Avenue, would be demolished and replaced with 4 new 8-story buildings that would include student housing and other campus uses, constructed over a common podium, which would include a quad area and subterranean parking.

Both Phases I and II include construction of portions of a cycleway throughout the South Campus. The proposed cycleway would serve as a campus circulation spine for pedestrians, cyclists, electric carts, and others, and would link all school buildings along S. Raymond Avenue.

Metro understands that the Master Plan is in the final environmental and entitlement phases, and will work with Project sponsor and the City to address the following comments as individual elements of the Master Plan are further developed. Given the scope of the Project, Metro respectfully requests to be notified of any changes to the Project design.

Response to Comment No. 4-3

The comment summarizes the description of the Project. While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As a responsible agency (as defined by CEQA and the CEQA Guidelines), Metro will be notified of any changes to the Project design since the Project would require Metro's approval of the temporary pedestrian bridge, the Main Quad proposed over the Metro Gold Line to connect the 988, 1101, and 1111 Buildings, and the proposed tunnel below the Metro Gold Line that would connect the subterranean garages under the 988, 1101, and 1111 Buildings.

Comment No. 4-4**Metro Comments**

It is noted that the Project sponsor is proposing to construct a large main quad area bridging over the Metro Gold Line Railroad Right-of-Way (ROW) and a subterranean tunnel under the Metro Gold Line connecting two parking areas. Metro recognizes the TOC supportive opportunities that are incorporated into the overall Project concept. However, such structures and developments will require close coordination with Metro Operations, Risk, Safety & Asset Management, Security and Construction/Engineering, as well as considerable investments by ArtCenter for structural, maintenance, and safety requirements inherent in constructing over an active railway. Any costs associated with the Project and resulting modifications or impacts to Metro facilities will be borne by the Project sponsor. Further, it is the expectation that the Project sponsor will indemnify Metro of any activities related to construction at the ArtCenter campus.

Metro will require a Funding/Reimbursement Agreement whereby transaction costs incurred by Metro shall be borne by the Project sponsor including, but not limited to, the actual cost of in-house staff time including LACMTA overhead and administrative costs and third party consultant fees (including but not limited to engineers, architects, legal counsel, flagpersons, and inspectors) involved in: (i) the technical review of conceptual plans, design drawings, construction specifications, safety and construction work plans and other plans and specifications subject to LACMTA review; (ii) performance of services related to on-site construction safety, methods, management, logistics and support; and (iii) negotiations and document preparation.

Response to Comment No. 4-4

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

ArtCenter would be required to comply with Metro requirements to meet all safety requirements inherent to constructing over or under an active railway.

Comment No. 4-5

Consistent with Metro's recommendation for the evaluation of alternative Project designs, (comment letter on Notice of Preparation of DEIR dated October 3, 2016) the Project sponsor has provided a summary of four (4) project alternatives to the proposed Project:

- 1) No Project/No Build Alternative
- 2) Reduced Building Height Alternative
- 3) No Encroachment Over and Under the Metro Right-of-Way Alternative
- 4) Change in Location of the New Commuter Services and Facilities Hub on the Hillside Campus to the North Lot Alternative

It should be noted in the DEIR, Alternative 3—No Encroachment Over and Under the Metro Right-of-Way—does not specifically indicate that seeking this alternative would make the Project infeasible. Instead, the analysis suggests that potential environmental impacts are similar to those highlighted in the proposed Project. Metro recommends that Alternative 3 be included in the final EIR, in the event that the Project design and coordination cannot be achieved by the Project sponsor thereby providing some flexibility to consider a design alternative.

Response to Comment No. 4-5

This Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Draft EIR for the Project, which circulated for public review and comment from October 26, 2017, through December 18, 2017, constitutes the first part of the EIR and is incorporated by reference and bound separately. (Please refer to Volumes 1 through 5 of the Draft EIR). Accordingly, Alternative 3 is included in the Final EIR for consideration by the decision-makers.

Comment No. 4-6

Metro Light Rail Operations & Structures

Initial review of the Project scope highlighted several issues related to the Project's proximity to the ROW. The following should be considered and/or addressed:

1. The Project sponsor is advised that the Metro Gold Light Rail Line currently operates weekday peak service as often as every six minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW to be spanned by the proposed Project. Metro's expectation is that Gold Line revenue service will not be interrupted. Should construction work plans indicate need for very limited periods of operational interruption, all Metro expenses incurred will be the responsibility of the Project sponsor. Additionally, all modifications to Metro facilities shall be at the sole expense of the Project sponsor.

2. It is noted that there are a number of Overhead Catenary System (OCS) support structures in the ROW, two of which are in the proposed overhead quad area, and which measure 26 feet from the track in height. Based on previous meetings with Metro and the Project sponsor, alternative means of electrification of the light rail system underneath the quad area may be feasible. Metro is committed to working with the Project sponsor to reach a design solution that is workable for both parties and maintainable for Metro.
3. The construction of the quad over the Metro ROW will result in the creation of a deck over the Gold Line rail tracks. The Project sponsor is advised that constructing over the ROW will require inclusion of fire, life and safety measures for transit patrons and Metro personnel to exit the passageway in the event of an emergency. The passageway will require appropriate ventilation, lighting, clearance and emergency access and walkways. Metro shall make an assessment of these requirements during the preparation of engineering and construction plans. All design requirements above and below Metro ROW must be coordinated with Metro's Construction/Engineering, Operations, Risk, Safety & Asset Management and Security Departments.
4. The quad shall be designed to the highest degree of structural integrity by incorporating waterproofing and hardscape elements that will not compromise the foundation and risk impacts to the rail system below. No equipment shall be installed below the quad area by the Project Sponsor unless authorized by Metro. Additional studies such as a deck drainage study will be required. Metro shall require the Project sponsor to submit design specifications to Metro for review and approval.
5. During the engineering and design phase, Metro Rail Operations and Track Department will further review the Project to determine whether the tracks will remain ballasted or direct fixation underneath the quad area.

Response to Comment No. 4-6

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

ArtCenter would be required to comply with Metro requirements to meet all safety requirements inherent to constructing over an active railway.

Comment No. 4-7

6. The cone of vision based on the proposed building's footprint (E. Glenarm Street and south side of rail ROW) presents a potential safety issue related to operator sightlines for southbound trains emerging from the Project's passageway. Visibility of vehicular and pedestrian activity on E. Glenarm Street will need to be improved from the conceptual design to prevent train, vehicular and pedestrian collisions. Approaching train warning horns will be required to be activated at this intersection. Close coordination with the Metro Active Transportation, Risk, Safety & Asset Management and Rail Operations Departments will be required to minimize potential for pedestrian, automobile and train collisions.
7. The Project may require CPUC (California Public Utilities Commission) and Fire Life Safety approval to reconfigure the traffic pattern along Glenarm Street. Metro strongly encourages the Project Sponsor to setback the building at Glenarm Street by at least ten (10) feet and redesign the façade without a blind spot.

Response to Comment No. 4-7

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

ArtCenter would be required to comply with Metro and CPUC requirements to meet all safety requirements inherent to constructing immediately adjacent to an active railway.

Comment No. 4-8

8. The undercrossing of the garage and spanning podium structure will also require close review from Metro Construction/Engineering and Security, and coordination with Rail Operations. Due to the intimate nature of the Project with Metro's ROW, the subterranean connection may require a blast study and additional structural support if indicated. Further, there shall be structural separation between Metro tracks from the quad structure above and underground parking structure below.

Response to Comment No. 4-8

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

ArtCenter would be required to comply with Metro requirements to meet all safety requirements inherent to constructing under an active railway.

Comment No. 4-9

9. There shall be no unpermitted encroachment onto the railroad ROW. The Project sponsor and contractor access to the ROW before and during construction will require a temporary right-of entry agreement, which must be obtained from Metro. Use of area above or below Metro ROW will require easement, lease or other document in consideration for use of such space.

Response to Comment No. 4-9

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

ArtCenter would be required to comply with Metro requirements to meet all safety requirements inherent to constructing over and under an active railway.

Comment No. 4-10

10. The Project sponsor should notify Metro of any changes to the construction/building plans that may impact the use of the ROW. Construction and/or excavation work on Metro ROW with potential to damage the tracks and related infrastructure may be subject to additional OSHA safety requirements.
11. Metro will need to review architectural and engineering drawings and calculations for the superstructure and structural foundations. Please refer to the attached Metro “Adjacent Construction Design Manual” for more details regarding submitting drawings and calculations to Metro for review. For more information, please contact Aspet Davidian at 213-922-5258/DavidianA@metro.net.
12. Considering the proposed Project’s proximity and the constrained space at this location, the Project sponsor should also be advised that construction activities will not be allowed to impact property and equipment unless otherwise approved in writing by Metro. Metro Operations must review construction plans and work plans prior to any permits being issued. Metro will require information on proposed excavation support systems as well as a soils report and calculations. Permits for special operations, including the use of a pile driver or any other equipment that could come into close proximity to the electrical rail support

system or support structure, must be obtained at least one week prior to the start of construction.

13. Any construction and/or future work affecting the proposed Project, including but not limited to signage/advertisement installation, or any other maintenance work within ten feet of the electrical rail support system will require a track allocation permit. Permits allowing for single tracking or a power shutdown must be obtained at least two weeks prior to the start of construction. The contractor should contact the following people regarding track allocation and/or special operation permits: Armando Jimenez, Rail Operations Director at 213-418-3025.or, [sic] the On-Duty Rail Operations Control Center Floor Manager at 323-563-5022.

Response to Comment No. 4-10

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As a responsible agency (as defined by CEQA and the CEQA Guidelines), Metro will be notified of any changes to the Project design since the Project would require Metro's approval of the temporary pedestrian bridge, the Main Quad proposed over the Metro Gold Line to connect the 988, 1101, and 1111 Buildings, and the proposed tunnel below the Metro Gold Line that would connect the subterranean garages under the 988, 1101, and 1111 Buildings. ArtCenter would be required to comply with Metro requirements to meet all safety requirements inherent to constructing over and under an active railway.

Comment No. 4-11

14. During construction, a wood fence and overhead protection barrier of acceptable material shall be constructed to prevent objects, material, or debris from falling onto the Metro ROW or contacting the electrical rail support system and structures. The electrical rail support system overhead should be treated like any high voltage electrical utility wire on any construction site. Proper signage should be posted for equipment working in and around the wires.
15. Metro staff shall be permitted to monitor construction activity to ascertain any impact to the ROW.
16. Metro shall require the Project sponsor to provide a five foot setback in order to maintain structural walls, track maintenance and other related activities for rail operations for all new structures. The Project areas immediately adjacent to the

Gold Line Right-of-Way should take general structural maintenance into account, along with Metro's need to maintain revenue service at all times and design the Project accordingly.

Response to Comment No. 4-11

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

ArtCenter would be required to comply with Metro requirements to meet all safety requirements inherent to constructing over, under, and immediately adjacent to an active railway.

Comment No. 4-12

17. Considering the intimate relation of the proposed Project to the railroad ROW, the Metro Gold Line will produce noise, vibration and visual impacts. A recorded Noise Easement Deed in favor of Metro is required, a form of which is attached. In addition, any noise mitigation required for the Project must be borne by the developers of the Project and not Metro. The easement recorded in the Deed will extend to successors and tenants as well.

Response to Comment No. 4-12

ArtCenter would be required to comply with Metro requirements to meet all safety requirements inherent to constructing immediately adjacent to an active railway. However, in 2015, the California Supreme Court, in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. Specifically, the decision held that an impact from the existing environment to a project, including future users and/or residents, is not an impact for purposes of CEQA.

Accordingly, while noise, vibration, and visual impacts of the Metro Gold Line on the proposed student housing is not considered an issue under CEQA, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 4-13*Metro Bus Operations*

Metro bus lines 686/687 operate on S. Raymond Ave, adjacent to the ArtCenter College South Campus. One Metro bus stop on the corner of S. Raymond Ave. and E. Glenarm St. is directly adjacent to the proposed Project. The following comments relate to bus operations and the bus stop:

1. Although the Project is not expected to result in any long-term impacts on bus operations, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final Project. Any bus stop relocated to accommodate the development of the Project shall first be submitted to and approved by Bus Operations prior to the start of construction.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.
3. Metro encourages the installation of bus shelters with benches, way finding signage, enhanced crosswalks with ADA-compliant ramps, as well as pedestrian lighting and shade trees in paths of travel to access transit stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.
4. Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Final design of the bus stop and surrounding sidewalk area must be compliant with the Americans with Disabilities Act (ADA) and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Response to Comment No. 4-13

As identified in Section IV.L, Traffic, of the Draft EIR, the following bus stops are located immediately adjacent to the South Campus:

- Raymond Avenue at Glenarm Street (Pasadena Transit Lines 51, 52; Metro Lines 686, 687)
- Arroyo Parkway at Glenarm Street (Pasadena Transit Line 20)

These bus stops may need to be relocated during Project construction. ArtCenter would be required to comply with transit agency requirements (i.e., Metro and Pasadena Transit) regarding bus stop relocation. Further, all ADA requirements would be required to be met by the Project.

Comment No. 4-14*Transit Orientation*

Considering the proximity to transit, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. Metro encourages the City and Project sponsor to be mindful of the Project's proximity to transit, including orienting pedestrian pathways toward the stations.
2. Metro would like to inform the Project sponsor of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Student Transit Access Pass (S-TAP) programs. The programs offer efficiencies and group rates for agencies like CUSD who can offer employees as an incentive to utilize public transit and students with a reduced fare for (K-12). For more information on employer and student programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.
3. Metro encourages the incorporation of transit-oriented and pedestrian-oriented designs that reduce standard parking provisions since the Project is located near light rail stations. These strategies could be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand.

Response to Comment No. 4-14

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The Project would incorporate Project Design Features L-1 through L-3 and would be designed to: (1) encourage walking, biking, and transit use; (2) ensure accessibility and provide a compatible transition to adjoining neighborhoods; and (3) create multimodal features and pedestrian/bicycle facilities that encourage other alternatives to motor vehicles. Specifically, the Metro Gold Line bisects the South Campus with the Fillmore Street Station located 300 feet north of the South Campus. ArtCenter shuttles would continue to provide a stop at two Metro Gold Line stations (i.e., at the Fillmore Station and Memorial Park Station) between the South Campus and the Hillside Campus. The Project Sponsor (ArtCenter) will be made aware of transit pass programs, as well as all Metro comments in general.

Comment No. 4-15*Active Transportation*

Metro encourages the Project sponsor to incorporate the following design recommendations into the Master Plan:

1. The City of Pasadena has installed Metro Bike Share kiosks. Metro requests that ArtCenter coordinate with Metro Bike Share for a potential bike share station at the South Campus site.
2. Ensure safe and convenient connections for pedestrians, people riding bicycles and users of Metro systems and other transit services to and from the Project sites. Metro encourages the Project sponsor to provide improvements on for people riding bicycles to Hillside and southside [sic] campus.
3. Provide way finding signage throughout the Project site to facilitate the usage of amenities for pedestrians, infrastructure for people riding bicycles, and transit services including Metro and others.
4. Provide adequate secure long-term and short-term bicycle parking at both Hillside and South campus sites. Short-term bicycle parking may include bicycle racks and/or curbside bicycle corrals on-site and/or in the public right-of-way. Long term bicycle parking may include bicycle lockers and/or secure bicycle storage areas.

5. The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design. Metro encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks and curb ramps, and other amenities along the primary building frontages to improve pedestrian safety and comfort to access the nearby transit amenities. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: https://media.metro.net/docs/sustainability_path_design_guidelines.pdf.

Response to Comment No. 4-15

While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The Project would incorporate Project Design Features L-1 and L-2, which would (1) encourage walking, biking, and transit use; (2) ensure accessibility and provide a compatible transition to adjoining neighborhoods; and (3) create multimodal features and pedestrian/bicycle facilities that encourage other alternatives to motor vehicles. Specifically, as identified in Section II, Project Description, of the Draft EIR, the South Campus would include bike parking/rental facilities and a mobility hub that would accommodate a large parking area consistent with Metro's active transportation recommendations identified above. The Project Sponsor (ArtCenter) will be made aware of these design recommendations, as well as all Metro comments in general.

Comment No. 4-16

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the Project sponsor of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the A.M. or P.M. weekday peak hour (of adjacent street traffic).

2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the A.M. or P.M. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1–D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

Response to Comment No. 4-16

The traffic analysis was completed in compliance with the CMP TIA requirements. Specifically, Impact L-2, starting on page IV.L-24 in Section IV.L, Traffic, of the Draft EIR, addressed the Project's impacts on CMP facilities, including arterial monitoring station locations and mainline freeway monitoring locations in Pasadena, and transit service consistent with the CMP TIA Guidelines established by Metro. The Draft EIR concluded that for both Phase I and Project buildout, impacts to the arterial monitoring station locations at Arroyo Parkway at California Boulevard (CMP ID 119), Pasadena Avenue/St. John Avenue at California Boulevard (CMP ID 120), and Rosemead Boulevard at Foothill Boulevard (CMP ID 121) would be less than significant. Similarly, the Draft EIR concluded that the Project would not add 150 or more trips onto the mainline freeway monitoring locations at SR-110 at Pasadena Avenue (CMP Station 1050), SR-134 west of San Rafael Avenue (CMP Station 1056), I-210 west of SR-134 and I-710 (CMP Station 1060), and I-210 at Rosemead Boulevard (CMP Station 1061) during either the A.M. or P.M. weekday peak hours, and, as such, impacts would be less than significant, and no further CMP analysis of the mainline freeway monitoring locations is required.

In addition, the CMP transit analysis included in the Draft EIR determined that for Phase I, there would be an estimated increase in transit trip ridership of 1,905 daily transit trips (192 A.M. peak-hour and 171 P.M. peak-hour transit trips) and for Project buildout, an estimated increase in transit trip ridership of 2,312 daily transit trips (226 A.M. peak-hour and 208 P.M. peak-hour transit trips). The Project would have available 14 transit stops, the Metro Gold Line, seven bus lines nearby, and the Project's own shuttle service.

Accordingly, the Draft EIR concluded that there would be adequate transit capacity to serve the Project.

Comment No. 4-17

Attachments:

1. Adjacent Construction Design Manual (8 pages)
2. Noise Easement Deed (4 pages)
3. CMP Appendix D: Guidelines for CMP Transportation Impact Analysis (7 pages)

Response to Comment No. 4-17

The attachments have been considered in the responses above. Please refer to Response to Comment Nos. 4-2, 4-4, 4-6 through 4-12, and 4-16.

Comment Letter No. 5

Adriana Raza
Will Serve Program
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Comment No. 5-1

Attached please find a pdf copy of the subject DEIR comment letter. The original was mailed to your attention today.

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on October 26, 2017. The proposed project is located within the jurisdictional boundaries of District No. 16. Previous comments submitted by the Districts in correspondence dated October 3, 2016 (copy enclosed), to your agency, still apply the subject project with the following updated information and additional comments:

Response to Comment No. 5-1

This comment serves as an introduction to the commenter's attached e-mailed letter regarding the Draft EIR, as well the NOP response previously provided by the Districts. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 5-2

1. The wastewater flow originating from the South Campus site will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Arroyo Seco Trunk Sewer Section 4 mentioned in item 1 of the enclosed copy.
2. The wastewater flow originating from the Hillside Campus site will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Joint Outfall B Unit 6J Trunk Sewer, located in Linda Vista Ave at Lida Street. The Districts' 16-inch diameter trunk sewer has a capacity of 6.6 million gallons per day (mgd) and conveyed a peak flow of 5.1 mgd when last measured in 2012.

Response to Comment No. 5-2

Page IV.M.2-2 in Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR acknowledged that wastewater generated in the City is carried by the local pipe system, which is owned by the City and operated by the City’s Department of Public Works Engineering Division, prior to discharging to the Districts’ trunk wastewater lines. A correction and additional information have been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to make specific references to the truck wastewater lines operated by the Districts.

Comment No. 5-3

3. The Los Coyotes Water Reclamation Plant (WRP) currently produces an average recycled water flow of 20.4 million gallons per day.

Response to Comment No. 5-3

Additional information has been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to make specific references to the water reclamation plant(s) that would serve the Project.

Comment No. 5-4

4. Based on the estimated existing wastewater generations determined on Table IV.M.2-1 (*Page IV.M.2-3*) and the estimated wastewater generation resulting from the project on Table IV.M.2-2 (*Page IV.M.2-6*), the expected increase in average wastewater flow from the South Campus site is 117,425 gallons per day. The expected increase in average wastewater flow from the Hillside Campus site is 2,264 gallons per day. For a copy of the Districts’ average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.

Response to Comment No. 5-4

The Project includes uses that were not included in the Districts’ table. For example, the Project would include on-campus student housing and a 24-hour campus program. If the generation rate for college/university were applied, the expected increase in average wastewater flow from ArtCenter would be 10,000 gpd between the two campuses, instead of the 120,522 gallons per day identified in the Draft EIR. Accordingly, the Draft EIR presents a more conservative estimate than what Table 1, Loadings for Each Class of Land Use, would generate. As described in Section II, Project Description, of the Draft EIR, the Project would focus growth on the South Campus, while providing for infrastructure

improvements and building renovations on its Hillside Campus. Specifically, within the Hillside Campus, improvements would include renovations and additions to existing buildings, additional parking, installation of PV solar cells and canopies over the existing surface parking stalls, and modifications to campus access, which would not significantly increase wastewater generation. The overall Project net generation presented in the Draft EIR is 833 gpd more than the total average wastewater flow that the commenter presented above.

Comment No. 5-5

5. (3) Sewage Treatment, *Page IV.M.2-3*, first paragraph—As specified in item 2 of the enclosed copy, the wastewater generated by the proposed project will be treated at either or both the Whittier Narrows WRP or the Los Coyotes WRP. The combined capacity from both facilities total to 52.5 mgd and currently produces a combined average recycled water flow of 27.7 mgd.

Response to Comment No. 5-5

Additional information has been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to make specific references to the water reclamation plant(s) that would serve the Project.

Comment No. 5-6

6. d. Analysis of Project Impacts, *Page IV.M.2-5*, second paragraph—Based on the Districts' average wastewater generation factors, the projects expected increase in average wastewater flow from both sites is a total of 119,689 gallons per day. Adjust accordingly throughout the remaining portions of the document.

Response to Comment No. 5-6

Please refer to Response to Comment No. 5-4 above.

Comment No. 5-7

7. Table IV.M.2-3, *Page IV.M.2-7*, Hillside Campus Net Generation—The proposed 11,320 square foot expansion to the South Building will increase the expected average wastewater flow by 2,264 gallons per day.

Response to Comment No. 5-7

The expansion of the South Building would primarily serve existing uses, including the shuttle drivers and storage areas, that would be shifted from the existing Ellwood Building. Accordingly, the average daily wastewater generation presented in the Draft EIR accounted for this shift in uses, instead of accounting for new uses. In addition, please refer to Response to Comment No. 5-4 above.

Comment No. 5-8

8. Table IV.M.2-3, *Page IV.M.2-7*, South Campus Net Generation—The proposed 1,500 student beds, 76,000 square foot Amenity/Lounge, and the 300 seat theatre will increase the expected average wastewater flow by 117,425 gallons per day.

Response to Comment No. 5-8

The Project includes uses that were not included in the Districts' table (i.e., generation factors for student beds, amenity/lounge, and theatre seats. Accordingly, the Draft EIR presents a more conservative estimate than what Table 1, Loadings for Each Class of Land Use, would generate.

Comment No. 5-9

9. All other information concerning Districts' facilities and sewerage service contained in the document is current.

Response to Comment No. 5-9

This comment provides concurrence with all other information concerning Districts' facilities and sewerage service. The comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 5-10

Attachment: Letter dated October 3, 2016 (2 pages)

Response to Comment No. 5-10

The attachment has been considered in the responses above. Please refer to Response to Comment Nos. 5-2 and 5-3.

Comment Letter No. 6

Barbara Goto, Director of Operations
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John Howell, Chief Executive Officer
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Comment No. 6-1

Attached you will find comments to the draft environmental impact report on the Art Center College of Design's Master Plan. We thank you for including our comments in the record.

Response to Comment No. 6-1

This comment serves as an introduction to the commenter's attached e-mailed letter regarding the Draft EIR. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 6-2

"ArtCenter has submitted one Master Plan application for a new 15-year Master Plan that encompasses development on and comprehensively identifies a vision for both the Hillside Campus and the South Campus." (DEIR page I-3, paragraph 3) The Hillside Campus comprises the entire 155.95 acres controlled by ArtCenter in the San Rafael Hills. (DEIR page I-1)

Some years ago ArtCenter retained the architectural firm of Gehry Partners, LLP to pursue a major expansion on its Hillside Campus. That plan was abandoned in favor of the current plan to expand the South Campus, in large part due to citizen opposition to development of the Hillside Campus. The opposition focused on the potential loss of natural open space and wildlife habitat. This same concern holds true today, only more so because the benefits of the natural open space to wildlife are now known to be dramatically more significant, as described below.

Page IV.C-4, paragraph 2.a.(3) of the DEIR describes the City's goal to sustain natural environmental resources for future generations, greenhouse gas reduction and climate

change impacts. “Several environmental policies were identified to support this goal. These policies include protecting natural open spaces, hillsides, watersheds and critical habitats; expanding the City’s inventory of natural open spaces; ... maintaining and restoring areas of the City with native plants; and maintaining and restoring wildlife corridors and habitat linkages.”

In choosing to develop the South Campus, ArtCenter is also deciding to not develop the Hillside Campus, presumably for the fifteen-year term of the Master Plan. “Development of the residential component of the Hillside Campus is not contemplated in the Master Plan.” (DEIR page III-11). We are concerned, however, with statements made in the DEIR regarding the lack of value of the Hillside Campus as a regional wildlife corridor.

Response to Comment No. 6-2

As described in Section IV.C, Biological Resources, of the Draft EIR, the San Rafael Hills are surrounded by highways and urban development, and there are no areas of open space that would provide a regional wildlife movement link to the biological study area (BSA), which has been delineated as the area encompassing the direct Project impact area and a buffer for indirect impacts but excludes areas of the Hillside Campus where no direct or indirect impacts on biological resources are expected. All proposed improvements on the Hillside Campus would be conducted within currently developed areas of the campus and would not expand into the undeveloped hillsides or into the undisturbed canyon north of Lida Street. The Draft EIR acknowledged that the BSA is likely used for local wildlife movement in the immediate area but, due to human development, is not within an essential connectivity area and is not expected to be used as a regional wildlife movement corridor. Please see Response to Comment No. 6-3 below for further discussion of the wildlife corridor north of Lida Street.

Comment No. 6-3

Section 2(b)3 of the DEIR states that “...the BSA is likely used for local wildlife movement in the immediate area. According to CDFW BIOS Habitat Connectivity Viewer, the BSA is not within an essential connectivity area and is not expected to be used as a regional wildlife movement corridor.” (DEIR page IV.C-11) “As discussed above in Subsection 2.b(3), there are no areas of open space that would provide a regional wildlife movement link to the BSA”. [sic] (IV.C-20)

This is an outdated and incorrect conclusion. In 2017, CDFW adopted the Eastern Rim of the Valley Conceptual Area Protection Plan (EROV CAPP), which highlighted and affirmed the ecological value of the region, on which ArtCenter’s hillside campus resides, as a wildlife corridor. CDFW has determined that Cottonwood Canyon, which includes the ArtCenter Hillside Campus, is in fact an integral part of a 20-mile long wildlife corridor. This

corridor, also known as the Hahamongna to Tujunga Wildlife Corridor (the “HTC,” see map below), runs from the San Gabriel Mountains at Hahamongna [sic] Watershed Park, down the Arroyo Seco, then into the San Rafael Hills via Cottonwood Canyon. There are approximately 2400 acres of natural open space in the San Rafael Hills, and the only notable ingress and egress is by way of Cottonwood Canyon. The HTC continues to the Verdugo Mountains and connects back up to the San Gabriel Mountains at Big Tujunga Wash. AFC and other conservation organizations including the Santa Monica Mountains Conservancy, Trust for Public Lands, The Nature Conservancy, and Citizens for Los Angeles Wildlife (CLAW), are working to secure and enhance the HTC. The entire Hillside Campus is a part of the HTC.

Response to Comment No. 6-3

Several attempts, including contacting the commenter and CDFW, have been made to obtain a copy of the EROV CAPP. However, a copy of the recently-adopted EROV CAPP by the California Department of Fish and Wildlife (CDFW) has not been provided to the City. In addition, a copy of the EROV CAPP could not be found via on-line searches, including a search of CDFW’s website. Accordingly, it is not possible to confirm the commenter’s statements regarding the ecological value of the Project area as a wildlife corridor and references to the EROV CAPP. As an alternative, the commenter provided a copy of the Hahamongna to Tujunga Wildlife Corridor (HTC) Biological Study (Biological Study). The City reviewed this Biological Study and found the HTC map provided at the end of the comment letter to be different from any of the maps/figures in the Biological Study. However, based on a review of the Biological Study and the map attached to the comment letter, Cottonwood Canyon is shown to encompass an area between Lida Street northward to I-210, excluding the Hillside Campus to the south of Lida Street. It should be noted that although ArtCenter owns a large area to the north and south of Lida Street, only the developed portions south of Lida Street comprise the Hillside Campus, which is not delineated as a wildlife hub and corridor or as a choke point. As such, no substantial evidence has been provided to locate the Hillside Campus within the HTC. Moreover, as described in the Draft EIR, the proposed project does not involve development into the currently undeveloped portion of ArtCenter’s property that surrounds the Hillside Campus. Therefore, the project would not restrict any regional wildlife movement that might occur in the area.

Comment No. 6-4

To provide additional context, AFC undertook the ecological study resulting in the EROV CAPP to provide a scientific underpinning to its program of land conservation. We know from multiple studies that strategic land conservation and restoration reduces the harmful impact of habitat fragmentation and is an essential mitigation measure for climate change. As species are displaced by higher temperatures and a drying landscape, wildlife

corridors allow movement to newly suitable habitats and enable populations to maintain connections essential to retain genetic diversity. The EROV area features exceptional lands that are vital for sustaining ecological and evolutionary landscape processes in the face of climate change.

As noted in the EROV CAPP, the connection between the Angeles National Forest and the Verdugo Mountains (and the San Rafael Hills between the two regions) was identified by a California Department of Fish and Wildlife biologist at the statewide Missing Linkages conference.¹ The Verdugo Mountains were also identified as Natural Landscape Block in need of connectivity by the California Essential Habitat Connectivity Project.² The EROV CAPP connects the Verdugo Mountains and San Rafael Hills to the South Coast Wildland Network.^{3,4} These landscape linkages and the wildlands they connect are largely considered the backbone of a regional conservation strategy for southern California to which smaller wildlands, such as the Verdugo Mountains and San Rafael Hills, can be connected.

- ¹ Penrod, K, R Hunter, and M Merrifield. 2001. Missing Linkages: Restoring connectivity to the California landscape. California Wilderness Coalition, The Nature Conservancy, US Geological Survey, Center for Reproduction of Endangered Species, and California State Parks.
- ² Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.
- ³ Beier, P., K. L. Penrod, C. Luke, W. D. Spencer, and C. Cabañero. 2006. South Coast Missing Linkages: Restoring connectivity to wildlands in the largest metropolitan area in the United States. Chapter 22 in K R. Crooks and MA Sanjayan, editors, Connectivity conservation: maintaining connections for nature. Cambridge University Press. <https://doi.org/10.1017/CBO9780511754821.025>
- ⁴ South Coast Wildlands. 2008. South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion. 67pp. <http://www.scwildlands.org/reports/SCMLRegionalReport.pdf>

Response to Comment No. 6-4

As with Response to Comment No. 6-3, without the opportunity to review the recently-adopted EROV CAPP, it is not possible to confirm or verify the commenter's statements regarding connectivity of the Hillside Campus to essential habitat. The City has reviewed the four references provided and none of them mention the San Rafael Hills. As such, no substantial evidence has been provided to support the assertion that the Hillside Campus is part of, or is connected to, a regional conservation strategy for Southern California. Moreover, as described in the Draft EIR, the proposed project does not involve development into the currently undeveloped portion of ArtCenter's property that surrounds the Hillside Campus. Therefore, the project would not restrict any regional wildlife movement that might occur in the area.

Comment No. 6-5

In addition, AFC's camera traps have documented a black bear moving through Cottonwood Canyon to access the San Rafael Hills and Verdugo Mountains. In particular, On June 8, 2016, a black bear with a red #2 tag in its ear was reported north of the 210 Freeway in La Canada. On June 10, two of our camera traps caught this bear walking up Cottonwood Canyon toward the Hillside Campus from a spring located on a parcel between Linda Vista Avenue and Normandy Drive, which is to the east of the Hillside Campus. Later that day it was sighted in the San Rafaels [sic] in the 2900 block of Saint Gregory Road in Glendale. On June 15 and again on June 17 bear #2 was spotted in the Whiting Woods development of the Verdugo Mountains, and after that in more distant reaches of the Verdugo Mountains. Bear #2 validated the use of the Hahamongna to Tujunga Wildlife Corridor by large mammals, of which the Hillside Campus is a part.

Response to Comment No. 6-5

The commenter states that camera traps have documented a black bear moving through Cottonwood Canyon to access the San Rafael Hills and Verdugo Mountains, specifically north of I-210 in La Cañada and near Linda Vista Avenue and Normandy Drive. These areas are at the northern end of Cottonwood Canyon and are not on ArtCenter's property. This area was not included in the BSA for the Project because no work would be conducted in this undisturbed portion of ArtCenter's property as a result of the implementation of the Master Plan.

Comment No. 6-6

Figure IV.C-1 depicts the Biological Study Area to be the north and south parking lots and immediately adjacencies. The entire Hillside Campus comprises an integral part of a critical wildlife corridor. Further, page IV.C-10, paragraph 2b.(2) describes the undeveloped portions of the Hillside Campus as "part of the last remaining natural habitat found in the City", [sic] underscoring its intrinsic value.

Response to Comment No. 6-6

The BSA encompasses developed parking lots, associated buildings, and a small buffer for indirect impacts. Although the BSA is likely to be used for local wildlife movement of birds and small wildlife, it is likely that regional wildlife movement of larger mammals would remain along the undeveloped hillsides outside of the Hillside Campus, where there is no development, and human activity is limited. The Project would not add buildings or structures within the Hillside Campus that would impede or reduce the ability for wildlife to move around the perimeter of the campus or through the undeveloped hillsides. After completion of the Project, wildlife would still be able to travel freely through the

undeveloped hillsides. Therefore; there would be no impact on Cottonwood Canyon, the wildlife corridor to the north of Lida Street, or regional wildlife movement within this area as a result of the implementation of the Master Plan on the developed portions of the Hillside Campus south of Lida Street.

Comment No. 6-7

Conclusions:

The DEIR operates on an incorrect conclusion that the Hillside Campus does not serve as a wildlife corridor. It is flawed, since the Hillside Campus is a functional part of a wildlife corridor.

- The Biological Study Area should be expanded to include the entire Hillside Campus.
- Full consideration should be given to the wildlife corridor attributes of the Hillside Campus.

Response to Comment No. 6-7

The BSA was delineated to encompass the direct Project impact area and a buffer for indirect impacts and purposely excluded areas of the Hillside Campus where no direct or indirect impacts on biological resources are expected to occur. All development conducted as part of the Project would be implemented within currently developed areas of the Hillside Campus and would not expand into the undeveloped hillsides.

Although the BSA is likely to be used for local wildlife movement of birds and small wildlife, it is likely that regional wildlife movement of larger mammals would remain along the perimeter of the developed campus and within the undeveloped hillsides where human activity is limited. The Project would not add buildings or structures within the Hillside Campus that would impede or reduce the ability for wildlife to move around the perimeter of the campus or through the undeveloped hillsides. Therefore, there would be no impact on Cottonwood Canyon or regional wildlife movement within this area as a result of the implementation of the Master Plan on the developed portions of the Hillside Campus south of Lida Street.

Comment No. 6-8

ArtCenter shifted its development focus from the Hillside Campus to the South Campus, in major part because of community concern about loss of natural open space and habitat. ArtCenter's choice to not develop the undeveloped portions of the Hillside Campus to the

north of Lida Street, coupled with the public purpose served by retaining it as natural open space, should result in fully considering its preservation as natural open space. The biology of the entire Hillside Campus should be evaluated.

Response to Comment No. 6-8

All development conducted as part of the Project would be within currently developed areas of the Hillside Campus. The Draft EIR adequately discusses the existing biological setting and analyzes the potential impacts from the Project. The BSA was delineated to encompass the direct Project impact area and a buffer for indirect impacts and correctly excluded areas of the Hillside Campus where no direct or indirect impacts on biological resources are expected to occur. The project would include work within currently developed areas and would not impact the natural open space surrounding the Hillside Campus. Phase II of the Project would include renovating and expanding the South Building and would be within the existing South Lot. The expanded facility would house administrative and transportation-related services. Staff and vehicles would access the building from the existing parking lot, and renovation and expansion of the South Building would not reduce the amount of natural open space surrounding the Hillside Campus. As the Project would not result in significant impacts associated with loss of natural open space or habitat, consideration of mitigation measures such as preservation of the undeveloped portions of the Hillside Campus and natural open space is not warranted and cannot be imposed as there is no nexus for such mitigation.

Comment No. 6-9

In addition, we request the following changes:

Delete these statements:

Section 2(b)3 of the DEIR states that "...the BSA is likely used for local wildlife movement in the immediate area. According to CDFW BIOS Habitat Connectivity Viewer, the BSA is not within an essential connectivity area and is not expected to be used as a regional wildlife movement corridor." (DEIR page IV.C-11)

"As discussed above in Subsection 2.b(3), there are no areas of open space that would provide a regional wildlife movement link to the BSA". [sic] (IV.C-20)

Replace these sentences as follows:

Section 2(b)3: “According to the CDFW-adopted Eastern Rim of the Valley Conceptual Area Protection Plan (EROV CAPP), the BAS [sic] is an essential part of a regional wildlife movement corridor.”

“As discussed above in Subsection 2.b(3), the undeveloped, open parts of the Hillside Campus are part of a regional wildlife corridor and the biological value of the entire Hillside Campus should be evaluated in that context.”

Response to Comment No. 6-9

As with Response to Comment No. 6-3, without the opportunity to review the EROV CAPP, it is not possible to verify the validity of the suggested replacement language. Therefore, the quoted texts in the Draft EIR are still accurate and were not revised as suggested. In particular, based on the CDFW BIOS Habitat Connectivity Viewer, the BSA continues to not be mapped as an essential connectivity area and is not expected to be used as a regional wildlife movement corridor. Furthermore, since the Project would not result in significant impacts associated with biological resources, consideration of mitigation measures such as expanding the BSA to evaluate the entire Hillside Campus is not warranted and cannot be imposed as there is no nexus for such mitigation.

Comment No. 6-10

Attachment: Hahamongna to Tujunga Wildlife Corridor map (1 page)

Response to Comment No. 6-10

As discussed in Response to Comment No. 6-3, the attached map was reviewed by the City, which determined that Cottonwood Canyon extended between Lida Street and I-210 to the north, excluding the Hillside Campus to the south of Lida Street.

Comment Letter No. 7

John Howell
Chief Executive and General Counsel
Arroyos & Foothills Conservancy
P.O. Box 1
Pasadena, CA 91102-0001

Barbara Goto
Director of Operations
Arroyos & Foothills Conservancy
P.O. Box 1
Pasadena, CA 91102-0001

Comment No. 7-1

In recent meetings we focused on the importance that Cottonwood Canyon plays as part of a wildlife corridor known as the Hahamongna to Tujunga Wildlife Corridor (“HTC”).

We want to bring to your attention that we submitted comments to ArtCenter’s Draft EIR. The DEIR incorrectly concludes that the Hillside Campus is not associated with a regional wildlife corridor. ArtCenter’s Hillside Campus is located in Cottonwood Canyon, and is an integral part of the HTC. Our comments to the DEIR are summarized as follows:

“The DEIR operates on an incorrect conclusion that the Hillside Campus does not serve as a wildlife corridor. It is flawed, since the Hillside Campus is a functional part of a wildlife corridor.

- The Biological Study Area should be expanded to include the entire Hillside Campus.
- Full consideration should be given to the wildlife corridor attributes of the Hillside Campus.

ArtCenter shifted its development focus from the Hillside Campus to the South Campus, in major part because of community concern about loss of natural open space and habitat. ArtCenter’s choice to not develop the undeveloped portions of the Hillside Campus to the north of Lida Street, coupled with the public purpose served by retaining it as natural open space, should result in fully considering its preservation as natural open space. The biology of the entire Hillside Campus should be evaluated.”

Please see the attached letter that we submitted for our complete comments.

Response to Comment No. 7-1

Please refer to Response to Comment Nos. 6-3 through 6-7 above.

Comment No. 7-2

Attached you will find comments to the draft environmental impact report on the Art Center College of Design's Master Plan. We thank you for including our comments in the record.

"ArtCenter has submitted one Master Plan application for a new 15-year Master Plan that encompasses development on and comprehensively identifies a vision for both the Hillside Campus and the South Campus." (DEIR page I-3, paragraph 3) The Hillside Campus comprises the entire 155.95 acres controlled by ArtCenter in the San Rafael Hills. (DEIR page I-1)

Some years ago ArtCenter retained the architectural firm of Gehry Partners, LLP to pursue a major expansion on its Hillside Campus. That plan was abandoned in favor of the current plan to expand the South Campus, in large part due to citizen opposition to development of the Hillside Campus. The opposition focused on the potential loss of natural open space and wildlife habitat. This same concern holds true today, only more so because the benefits of the natural open space to wildlife are now known to be dramatically more significant, as described below.

Page IV.C-4, paragraph 2.a.(3) of the DEIR describes the City's goal to sustain natural environmental resources for future generations, greenhouse gas reduction and climate change impacts. "Several environmental policies were identified to support this goal. These policies include protecting natural open spaces, hillsides, watersheds and critical habitats; expanding the City's inventory of natural open spaces; ...maintaining and restoring areas of the City with native plants; and maintaining and restoring wildlife corridors and habitat linkages."

In choosing to develop the South Campus, ArtCenter is also deciding to not develop the Hillside Campus, presumably for the fifteen-year term of the Master Plan. "Development of the residential component of the Hillside Campus is not contemplated in the Master Plan." (DEIR page III-11). We are concerned, however, with statements made in the DEIR regarding the lack of value of the Hillside Campus as a regional wildlife corridor.

Section 2(b)3 of the DEIR states that "...the BSA is likely used for local wildlife movement in the immediate area. According to CDFW BIOS Habitat Connectivity Viewer, the BSA is

not within an essential connectivity area and is not expected to be used as a regional wildlife movement corridor.” (DEIR page IV.C-11) “As discussed above in Subsection 2.b(3), there are no areas of open space that would provide a regional wildlife movement link to the BSA”. [sic] (IV.C-20)

This is an outdated and incorrect conclusion. In 2017, CDFW adopted the Eastern Rim of the Valley Conceptual Area Protection Plan (EROV CAPP), which highlighted and affirmed the ecological value of the region, on which ArtCenter’s hillside campus resides, as a wildlife corridor. CDFW has determined that Cottonwood Canyon, which includes the ArtCenter Hillside Campus, is in fact an integral part of a 20-mile long wildlife corridor. This corridor, also known as the Hahamongna to Tujunga Wildlife Corridor (the “HTC,” see map below), runs from the San Gabriel Mountains at Hahamongna [sic] Watershed Park, down the Arroyo Seco, then into the San Rafael Hills via Cottonwood Canyon. There are approximately 2400 acres of natural open space in the San Rafael Hills, and the only notable ingress and egress is by way of Cottonwood Canyon. The HTC continues to the Verdugo Mountains and connects back up to the San Gabriel Mountains at Big Tujunga Wash. AFC and other conservation organizations including the Santa Monica Mountains Conservancy, Trust for Public Lands, The Nature Conservancy, and Citizens for Los Angeles Wildlife (CLAW), are working to secure and enhance the HTC. The entire Hillside Campus is a part of the HTC.

To provide additional context, AFC undertook the ecological study resulting in the EROV CAPP to provide a scientific underpinning to its program of land conservation. We know from multiple studies that strategic land conservation and restoration reduces the harmful impact of habitat fragmentation and is an essential mitigation measure for climate change. As species are displaced by higher temperatures and a drying landscape, wildlife corridors allow movement to newly suitable habitats and enable populations to maintain connections essential to retain genetic diversity. The EROV area features exceptional lands that are vital for sustaining ecological and evolutionary landscape processes in the face of climate change.

As noted in the EROV CAPP, the connection between the Angeles National Forest and the Verdugo Mountains (and the San Rafael Hills between the two regions) was identified by a California Department of Fish and Wildlife biologist at the statewide Missing Linkages conference.¹ The Verdugo Mountains were also identified as Natural Landscape Block in need of connectivity by the California Essential Habitat Connectivity Project.² The EROV CAPP connects the Verdugo Mountains and San Rafael Hills to the South Coast Wildland Network.^{3,4} These landscape linkages and the wildlands they connect are largely considered the backbone of a regional conservation strategy for southern California to which smaller wildlands, such as the Verdugo Mountains and San Rafael Hills, can be connected.

- ¹ Penrod, K, R Hunter, and M Merrifield. 2001. Missing Linkages: Restoring connectivity to the California landscape. California Wilderness Coalition, The Nature Conservancy, US Geological Survey, Center for Reproduction of Endangered Species, and California State Parks.
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- ³ Beier, P., K. L. Penrod, C. Luke, W. D. Spencer, and C. Cabañero. 2006. South Coast Missing Linkages: Restoring connectivity to wildlands in the largest metropolitan area in the United States. Chapter 22 in K R. Crooks and MA Sanjayan, editors, Connectivity conservation: maintaining connections for nature. Cambridge University Press. <https://doi.org/10.1017/CBO9780511754821.025>
- ⁴ South Coast Wildlands. 2008. South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion. 67pp. <http://www.scwildlands.org/reports/SCMLRegionalReport.pdf>

In addition, AFC's camera traps have documented a black bear moving through Cottonwood Canyon to access the San Rafael Hills and Verdugo Mountains. In particular, On June 8, 2016, a black bear with a red #2 tag in its ear was reported north of the 210 Freeway in La Canada. On June 10, two of our camera traps caught this bear walking up Cottonwood Canyon toward the Hillside Campus from a spring located on a parcel between Linda Vista Avenue and Normandy Drive, which is to the east of the Hillside Campus. Later that day it was sighted in the San Rafaels in the 2900 block of Saint Gregory Road in Glendale. On June 15 and again on June 17 bear #2 was spotted in the Whiting Woods development of the Verdugo Mountains, and after that in more distant reaches of the Verdugo Mountains. Bear #2 validated the use of the Hahamongna to Tujunga Wildlife Corridor by large mammals, of which the Hillside Campus is a part.

Figure IV.C-1 depicts the Biological Study Area to be the north and south parking lots and immediately adjacencies. The entire Hillside Campus comprises an integral part of a critical wildlife corridor. Further, page IV.C-10, paragraph 2b.(2) describes the undeveloped portions of the Hillside Campus as "part of the last remaining natural habitat found in the City", [sic] underscoring its intrinsic value.

Conclusions:

The DEIR operates on an incorrect conclusion that the Hillside Campus does not serve as a wildlife corridor. It is flawed, since the Hillside Campus is a functional part of a wildlife corridor.

- The Biological Study Area should be expanded to include the entire Hillside Campus.
- Full consideration should be given to the wildlife corridor attributes of the Hillside Campus.

ArtCenter shifted its development focus from the Hillside Campus to the South Campus, in major part because of community concern about loss of natural open space and habitat. ArtCenter's choice to not develop the undeveloped portions of the Hillside Campus to the north of Lida Street, coupled with the public purpose served by retaining it as natural open space, should result in fully considering its preservation as natural open space. The biology of the entire Hillside Campus should be evaluated.

In addition, we request the following changes:

Delete these statements:

Section 2(b)3 of the DEIR states that "...the BSA is likely used for local wildlife movement in the immediate area. According to CDFW BIOS Habitat Connectivity Viewer, the BSA is not within an essential connectivity area and is not expected to be used as a regional wildlife movement corridor." (DEIR page IV.C-11)

"As discussed above in Subsection 2.b(3), there are no areas of open space that would provide a regional wildlife movement link to the BSA". [sic] (IV.C-20)

Replace these sentences as follows:

Section 2(b)3: "According to the CDFW-adopted Eastern Rim of the Valley Conceptual Area Protection Plan (EROV CAPP), the BAS is an essential part of a regional wildlife movement corridor."

"As discussed above in Subsection 2.b(3), the undeveloped, open parts of the Hillside Campus are part of a regional wildlife corridor and the biological value of the entire Hillside Campus should be evaluated in that context."

Attachment: Hahamongna to Tujunga Wildlife Corridor map (1 page)

Response to Comment No. 7-2

This is a duplicate submittal of Comment Letter No. 6 above. Please refer to Response to Comment Nos. 6-1 through 6-10 above.

Comment Letter No. 8

Nina Chomsky, President
Linda Vista–Annandale Association
P.O. Box 94364
Pasadena, CA 91109-4364

Comment No. 8-1

Attached is our LVAA Comment Letter for the Art Center DEIR.

Please indicate that you received the letter prior to the deadline. Thank you,

Response to Comment No. 8-1

This comment serves as an introduction to the commenter’s attached e-mailed letter regarding the Draft EIR. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 8-2

The Linda Vista–Annandale Association (LVAA) appreciates this opportunity to comment on the Art Center College of Design (the Art Center) October, 2017 Master Plan Draft Environmental Impact Report (DEIR).

Incorporated in 1930, LVAA is a California non-profit, mutual benefit corporation, tax exempt under IRC Section 50(c)(4), and corresponding California law, dedicated to the improvement and development of the Linda Vista~Annandale [sic] area of Pasadena, and promotion of the general welfare of Linda Vista~Annandale [sic] residents.

The Linda Vista~Annandale [sic] area consists of roughly 2.5 square miles, extending from the west bank of the Arroyo Seco to the boundary with Glendale in the area of the Linda Vista portion of the San Rafael Hills, and from the Devil’s Gate Dam and the 210 Freeway on the north to the 134 Freeway on the south.

The neighborhood includes, and LVAA represents, approximately 1,350 homes. The neighborhood also includes, importantly, the Art Center Hillside campus.

Response to Comment No. 8-2

This comment provides an overview of the Linda Vista–Annandale Association and the area it encompasses. While the comment does not address the content or adequacy of the Draft EIR, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 8-3

1. Scope of This Comment Letter. This Comment Letter is intended to supplement, clarify and add to LVAA's recent oral DEIR comments to the Planning Commission.

Response to Comment No. 8-3

The commenter references the comment letter submitted during the public review period of the Draft EIR and oral testimony provided at the Planning Commission meeting held at the South Campus on November 8, 2017. The commenter provided the following oral comments to the Planning Commission regarding the Draft EIR:

- LVAA's concerns regarding views of the solar panels from private backyards of hillside residences; the commenter mentioned that LVAA will be conducting its own study to determine which homes will have significant impacts related to views of the solar panels;
- Implementation of sustainability measures not only at the South Campus but at the Hillside Campus by preserving and planting more trees instead of the removal of hundreds of trees to accommodate the solar panels;
- LVAA's concerns regarding the CNG facility as a hazardous materials issue and a potential significant impact to an area identified as one of the highest fire danger areas in California;
- Acknowledgement that ArtCenter considered LVAA's comments about reducing vehicle trips to and from the Hillside Campus by providing shuttles but asked for the use of electric shuttles instead of CNG-fueled vehicles; and
- LVAA's concerns regarding a rumor that there is another proposal for development of the undisturbed portions of the Hillside Campus; the commenter recommended an official dedication of open space related to the undeveloped portions of the Hillside Campus.

With regard to the comments in the first item, solar panels were evaluated in the Draft EIR and were determined to result in less than significant impacts associated with glare. Refer to page IV.A-47 of Section IV.A, Aesthetics, of the Draft EIR and Topical

Response 2, above. In addition, the comment in the second item above regarding the commenter's preference for more trees in lieu of solar panels is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. In addition, note that the trees removed as a result of installation of the solar panels within the surface parking areas would be replaced on a one-to-one basis by the Applicant.

With regard to the third comment regarding shuttles, as part of the Project, an increase in the number of shuttles between the campuses has been incorporated into the Project. The commenter's preference for electric shuttles instead of shuttles that use compressed natural gas (CNG) is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

With regard to the last item above, no other Project has been filed for the Hillside Campus. In addition, with regard to the recommendation for an official dedication of open space within the undeveloped portions of the Hillside Campus, please refer to Response to Comment No. 6-8, above.

Comment No. 8-4

2. South Campus: Digital Gallery. The Aesthetics and Land Use and Planning Sections of the DEIR are inadequate in that they do not adequately consider the significant impacts of the proposed Digital Gallery. The proposed Digital Gallery has the significant potential to disrupt traffic on Arroyo Parkway and adjacent streets and freeway; does not fit with the traditional character and urban design aesthetics of Pasadena; is not consistent with the traditional character and design standards for such an important City entrance; and, will have the potential to enable commercial, advertising, and promotional efforts to enhance the business goals of the Art Center. This proposal should be removed from the Project Description, or, in the alternative, be separately subject to Planning Commission and Design Commission separate and specific review as mitigation requirements, in addition to review by DOT.

Response to Comment No. 8-4

Pages IV.A-45, IV.A-46, IV.A-49 in Section IV.A, Aesthetics, of the Draft EIR addressed the impacts of the proposed digital gallery as it relates to visual and architectural character of the surrounding area, consistency with the long range vision of the General Plan, and lighting/illumination. In Section IV.L, Traffic of the Draft EIR the potential impacts of the digital gallery on traffic were addressed on pages IV.L-26 through IV.L-29 and IV.L-31, including a mitigation measure to ensure that the digital gallery does not create confusion with traffic signals at the intersection of Glenarm Street and SR-110/Arroyo Parkway. The Draft EIR concluded that implementation of Mitigation Measure L-1, along with review by the Pasadena DOT and other relevant agencies, will ensure the proposed

digital gallery is not a hazard to motorists traveling near the South Campus. Note that the City cannot create unique review processes for elements of projects, but can only subject a project to the appropriate review process already codified in the PMC.

Comment No. 8-5

3. Hillside Campus: Project Location and Setting. The DEIR incorrectly describes the Hillside Campus as having “no development” immediately adjacent to the Hillside Campus, and, the LVAA many adjacent residences as “more distant” surrounding uses. In fact, many residential uses in the LVAA area are immediately adjacent to the Hillside Campus. Many homes in the LVAA area look directly at some aspect of the Art Center Hillside Campus through a number of sight lines, and uses at the Hillside Campus, particularly traffic, directly and significantly impact the LVAA neighborhood areas adjacent to the Hillside Campus.

Response to Comment No. 8-5

A correction and additional information have been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to clarify the description of surrounding uses. The first sentence of the fourth paragraph in Volume 1, Section III, Project Description, page III-7, Subsection C.1, has been revised to state that no development is located immediately adjacent to the Hillside Campus buildings/structures and that there is a minimum buffer of 250 feet between the campus buildings/structures and the nearest single-family residences provided by sloped dense vegetation. Accordingly, most of these single family residences to the north, east, and south have no direct line-of-sight into the Hillside Campus, particularly of the buildings and parking lots.

Comment No. 8-6

4. Hillside Campus: Biological Resources. The DEIR inadequately discusses Biological Resources, particularly wildlife corridors. The assertion in the DEIR that the Hillside Campus area is not part of a regional wildlife connectivity/wildlife movement corridor is simply false. Reference is made to the Arroyo [sic] and Foothills Conservancy and the detailed and specific knowledge that this Conservancy has accumulated regarding the wildlife corridors in the LVAA area in general and the Hillside Campus in particular.

Response to Comment No. 8-6

Please refer to responses to Comment Letter Nos. 6 and 7 above.

Comment No. 8-7

Project Alternative 4. Further consideration should be given to requiring implementation of Project Alternative 4 as the “environmentally superior alternative” to avoid disturbance to the hillside area adjacent to the South Building, and, therefore, better preserve wildlife corridors and other impacts on Biological Resources. However, this Alternative should only be further considered if the impact on wildlife corridors would be less than the current Project proposal to expand the South Building.

Response to Comment No. 8-7

Please refer to Response to Comment No. 6-6 for a discussion of wildlife corridors. Neither the Project nor Alternative 4 would add buildings or structures within the Hillside Campus that would impede or reduce the ability for wildlife to move around the perimeter of the campus or through the undeveloped hillsides.

Comment No. 8-8

5. Hillside Campus: Phase II CNG Fueling Facility; Fire Protection; Hazardous Materials. As stated in the DEIR, and, as known to LVAA and the City of Pasadena, the LVAA area, including the Hillside Campus, is located in a Very High Fire Hazard Area.

Any wildfire, such as those burning this year in L.A., Ventura, and Santa Barbara counties, would almost certainly overwhelm the entire LVAA area in a very short time leading to a conflagration of unprecedented scope with severe impact similar to the Oakland Fire some years ago. These impacts would be further exacerbated by open spaces adjacent to the Hillside Campus, and by the few exits from our hillsides, mostly consisting of narrow, substandard public and private streets. The DEIR is inadequate in that it does not address the details and specifics of the Fire risks and potential impacts and results of an urban wildfire in the LVAA area and including the Hillside Campus. In this regard, the DEIR is inadequate in that it does not analyze exactly how Fire services will access the Hillside Campus considering the large number of substandard public and private streets surrounding the Hillside Campus, particularly if large numbers of neighbors are trying to drive down these streets to escape while Fire personnel are trying to travel up to the Hillside Campus, and, what is supposed to occur if there is a major Rose Bowl event at the same time clogging Linda Vista Ave. and other escape routes.

The potential CNG Fueling Facility is highly controversial, in part due to the potential to cause such an urban wildfire. However, LVAA is less concerned with potential causation than with the potential impacts with respect to an existing urban wildfire that starts in or reaches the Hillside Campus and causes the CNG Fueling Facility to fail in some manner, including exploding, resulting in exacerbating and spreading the fire conflagration while

escape and access are limited as described above. The DEIR is inadequate in that it fails to analyze the impacts of an existing urban wildfire on any CNG Fueling Facility on the Hillside Campus, including, but not limited to, the ability of any such Facility/Tanks to resist or avoid failure in response to an urban wildfire.

LVAA suggest the following Mitigation Measure as [sic] applied to the potential CNG Fueling Facility: change the Project Description to eliminate the potential CNG Fueling Facility, particularly since another location exists for it or several of them—namely, the South Campus. See also the following discussion regarding Art Center Shuttles.

Response to Comment No. 8-8

Development of the Hillside Campus would include renovations and additions to existing buildings, additional parking, installation of photovoltaic solar cells and canopies over the existing surface parking stalls, and modifications to campus access. As discussed in Section IV.K, Public Services—Fire Protection, of the Draft EIR, these modifications would be constructed in accordance with the specific regulatory requirements set forth in the PMC and CBC. Refer to pages IV.K-12 through IV.K-16 of the Draft EIR regarding the analysis of potential impacts associated with fire protection, which were determined to be less than significant. Also, please refer to pages IV.G-36 and IV.G-37 of Section IV.G, Hazards and Hazardous Materials, of the Draft EIR with regard to construction-related hazards impacts that were determined to be less than significant, and to pages IV.G-40 through IV.G-42 of the Draft EIR regarding the less than significant hazards impacts associated with operation of the Project, including the potential CNG facility. Also please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 8-9

6. Hillside Campus: Air Quality and Traffic; Shuttles. The current two shuttles between the Hillside Campus and the South Campus have assisted in reducing the number of student and staff vehicles traversing the LVAA area, including, most significantly, Lida St. However, these shuttles are currently “dirty” vehicles, powered by gasoline or diesel. The DEIR indicates that the number of shuttles will be increased from two to six, running much more frequently.

The DEIR is inadequate in that it does not consider the existing Air Quality and Traffic impacts, and the potential significant Air Quality and Traffic Impacts of tripling the number of Shuttles if the Shuttles remain gasoline or diesel fueled. Further, the Project Description is inadequate in that the Art Center has made any number of commitments to the LVAA neighborhood that its shuttles would eventually be “clean” shuttles. It appears that the

“plan”, [sic] although not reflected in the Project Description, is to convert the shuttles to CNG.

Response to Comment No. 8-9

Both existing and proposed shuttle trips between the Hillside Campus and the South Campus were considered in the daily trip generation calculation provided in the Traffic Impact Analysis, Appendix L, of the Draft EIR. Regional operational emissions associated with vehicular traffic were calculated using CalEEMod and provided in Appendix C of the Draft EIR. The daily trip generation rates used in this modeling were consistent with the Traffic Impact analysis and similarly included the existing and proposed shuttle trips. However, in response to this comment, further calculation of these emissions is included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR. A summary of the calculations is provided below.

The two existing shuttles are powered by gasoline engines, and there are no plans to use diesel-powered shuttles. The two existing shuttles that operate between the Hillside Campus and the South Campus generate approximately 0.1 pound per day of volatile organic compounds (VOC), 0.5 pounds per day of nitrogen oxides (NO_x), 1.8 pounds per day of carbon monoxide (CO), and less than 0.01 pound per day of respirable particulate matter with an aerodynamic diameter equal to or less than 10 micrometers (PM₁₀) and fine particulate matter with an aerodynamic diameter equal to or less than 2.5 micrometers (PM_{2.5}). Conservatively assuming that the four additional shuttles would operate using gasoline, pollutant emissions would increase by less than 0.01 pound per day of VOC, 0.1 pound per day of NO_x, 0.2 pound per day of CO, and less than 0.01 pound per day of PM₁₀ and PM_{2.5}. Also, the four additional shuttles purchased for the Project would be newer models which will comply with more stringent emissions standards. Therefore, the additional shuttles would emit less pollutants when compared to the existing shuttles. Assuming that these emissions are new emissions even though they were already considered in the trip generation rates, no changes would occur to the significance conclusions presented in Section IV.B, Air Quality, of the Draft EIR. Conversion of these shuttles to CNG would further reduce pollutant emissions. In addition, please note that use of these shuttles results in a reduction in overall emissions in comparison to a scenario in which students would have to drive personal vehicles between the two campuses.

Comment No. 8-10

Shuttle conversion to CNG would significantly reduce Air Quality and Traffic impacts from than [sic] gas or diesel fuels in the LVAA neighborhood, but such mitigation should be coordinated with relocating any CNG Fueling Station from the Hillside Campus to the South Campus.

LVAA suggests that a mitigation measure be added to the DEIR requiring prompt Shuttle conversion to electric vehicles as represented to LVAA in many prior Master Plan discussions with the Art Center. The Art Center argument and defense that electric vehicles are “too expensive” is not a CEQA issue or defense. Electric shuttles would mitigate a number of significant impacts on the LVAA neighborhood, and should be adopted as a mitigation and as part of the Project Description.

Response to Comment No. 8-10

The Draft EIR did not identify any significant impacts related to air quality and traffic (related to trips) to enable the City to legally impose the implementation of a mitigation measure to convert to electric vehicles, nor were electric vehicles or their cost discussed in the Draft EIR. However, the comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. Please also refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 8-11

7. Hillside Campus: Solar Panel Canopies Over North and South Parking Lots; Aesthetics and Land Use. The DEIR is inadequate in that it does not analyze or mitigate the potential view impacts, and light and glare impacts, to Pasadena residents in the LVAA area who look down on the Art Center parking lots. There is some number of such residents, and the number and location of them, including views from these properties, is of importance to LVAA if there will be an aesthetic impact to these residents, including, but not limited to, light and glare. LVAA understands that these panels may be reflective at some points during sunny days.

Response to Comment No. 8-11

As discussed in Section IV.A, Aesthetics, of the Draft EIR, due to the limited visibility of the Hillside Campus from the surrounding area, only one public view from the hillside to the north along St. Katherine Drive at an elevation that is 400 feet higher than the Hillside Campus and at a distance of approximately 0.5 mile from the nearest portion of the campus where the PV would be installed, the north parking lot, was available for visual simulation(refer to Figure IV.A-14 on page IV.A-35 of the Draft EIR), and the comment does not provide addresses to support a different conclusion. As shown in the visual simulation, the topography of the area and the dense vegetation naturally block most views of the Hillside Campus from the surrounding residential areas. Views of hillside residences at a distance of 0.4 mile would be similar to that presented in the visual simulation. When compared to existing conditions, the proposed improvements within the Hillside Campus do not result in a significant change in views of the Hillside Campus or the more important and

significant views of Scholl Canyon and the Los Angeles Basin in the horizon. The Draft EIR acknowledged that some of the proposed PV panels and canopies at the North Lot and South Lot may be minimally visible to a few hillside residences, but all other proposed improvements, including the enclosure of the Sinclair Pavilion, the expansion of the South Building, and modifications to the Hillside Campus entrance and circulation, would not be visible from the surrounding area. The installation of the proposed PV panels and canopies at the North Lot and South Lot may alter the visual character of the Hillside Campus by replacing parking lot trees; however, because the trees that are proposed for removal do not have large canopies or trunks with five to seven inches diameter at breast height (DBH), these trees are not prominent at great distances, such as those from the hillside residences with views of the Hillside Campus. In addition, as discussed in Response to Comment No. 8-12 below, in accordance with the City's Trees and Tree Protection Ordinance, some trees would be replanted on the Hillside Campus. Finally, as acknowledged by the comment, solar panels are constructed to absorb sunlight and convert it to solar energy, so in virtually all instances and at virtually all times of day, solar panels are minimally reflective, if at all.

Please also refer to Topical Response No. 2: Solar Panels, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 8-12

Further, installation of these canopies will result in the removal of a number of trees. This will follow the removal of a large number of mature trees to previously expand the parking lots. The Art Center representative at the recent Planning Commission hearing on the DEIR indicated that one purpose of the canopies is to reduce the heat island effect of the parking lot asphalt. LVAA suggests a more natural mitigation: replant and reinstall the tree shade canopy that previously enhanced the parking lots, particularly the South parking lot. The previous "urban forest", [sic] consisting of many mature Sycamores, cooled the lots and enhanced the views and scenic vistas of all the residents above the Hillside Campus, including those in Pasadena and Glendale.

Response to Comment No. 8-12

Existing trees at the North Lot and South Lot currently provide very little cooling effect as they do not have large canopies to provide much shading. Although the Project would involve the removal of a total of 148 trees, 45 trees from the North lot and 103 trees from the South Lot, only one tree (Aleppo pine, a Specimen tree) on the North Lot is a protected tree defined by the City's Tree Ordinance. As discussed in Page IV.C-20 of Section IV.C, Biological Resources, of the Draft EIR, the Project would be required to comply with the City's Trees and Tree Protection Ordinance, which requires a Private Tree Removal Permit and replacement trees or payment of compensatory fees up to 50 percent

of the required number of replacement trees. Per the ordinance, the number and species of replacement trees is based on the DBH and the species of the removed trees. Replacement of the removed trees is required within a reasonable period of time (typically specified as within five years of removal of the protected tree). In addition, the trees removed as a result of installation of the solar panels within the surface parking areas would be replaced on a one-to-one basis by the Applicant. Accordingly, the number of trees on the Hillside Campus would not be reduced. Finally, it should be noted that cooling of the parking lots occurs with shade, which the solar panels would also immediately provide. In addition, the area shaded by the solar panels would be greater than the area currently shaded by the existing trees.

Comment Letter No. 9

Brian Berger, President
Mirador Ranch Homeowners Association
1460 Rutherford Drive
Pasadena, CA 91103-2773

Comment No. 9-1

Attached is your copy of a letter copied to the councilperson. It is regarding a concern of our association regarding a possible CNG tank shown in Phase II of the expansion plan for the Hillside Art Center. The word is “concern”, not outright opposition. We recognize this plan is five years plus in the future and that many things can change.

I am sharing this with you in case the mailed, signed copy to the Councilperson gets lost. I di [sic] follow the mail address given to me by the city.

The Board of the Mirador Ranch Homeowners Association has had a chance to review the 15 year Master Plan for the Art Center College of Design presented at the special planning meeting on November 8, 2017. We have a fire safety concern with one element proposed in Phase II: namely, the installation of a CNG fueling station (commuter services and facilities hub) at the Hillside campus at the south lot. Although we understand that Phase II is at least five years in the future we are asking for additional information on all required safety-related restrictions for our Board’s review before such an installation.

The forty two [sic], single-family homes that are a part of the Mirador Ranch Homeowners Association are neighbors to the Hillside Art Center. In the only reference to us that we could find, there was an entry of Rutherford Drive which is the primary loop street to our development which is reached by El Mirador Drive off Linda Vista.

Mirador Ranch commits a significant amount of its budget each year to be certain that we comply with The [sic] City of Pasadena’s Fire Department brush clearance requirements both on our common area and at each home. That includes the large association culvert system on the common area of our development that borders the college. We were pleased to see that the proposed improvements to the Hillside campus included additional culvert work. However we are also concerned about the explosive potential of the CNG refueling site, a system that will also require refueling tankers to travel through what are now neighborhood streets. Therefore, we request that you address our concerns regarding the CNG refueling site before any Phase II implementation activity begins.

Response to Comment No. 9-1

While the comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the CNG facility are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above. As indicated therein, the natural gas would be delivered via existing lines and delivery of natural gas via refueling tankers would not occur. In addition, as also discussed in Topical Response No. 1, the CNG facility would be designed, constructed and operated in accordance with regulatory requirements, including requirements related to fires and safety.

Comment Letter No. 10

Teresa Anderson-Dvoracek
1575 Knollwood Terrace
Pasadena, CA 91103-1909

Comment No. 10-1

I received information a while back stating that Art Center was planning to make some changes on their campuses. This information was very vague and did not appear to impact the campus above Lida. It looked like they were just going to build an access road. I thought great! This would be to protect the campus and our area in case of a fire. Now I am reading that they are actually planning to make changes that would affect the quality of life in our neighborhood.

Response to Comment No. 10-1

While the comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

However, as described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus, while providing for infrastructure improvements and building renovations on its Hillside Campus. Specifically, improvements within the Hillside Campus would include renovations and additions to existing buildings, installation of PV solar cells and canopies over the existing surface parking stalls, and modifications to campus access. No improvements to the undisturbed portions of the Hillside Campus north of Lida Street are proposed. A small portion of the base of the slope to the rear of the South Building in the South Lot may be temporary encroached upon during Project construction, but no other areas outside of the existing footprint of developed and paved areas of the Hillside Campus would be disturbed by the Project.

Comment No. 10-2

The Art Center campus is located in a residential area. That should be remembered first and foremost. While I'm all for saving energy I have read that glare from solar panels can actually shine into peoples [sic] homes or into their eyes as they are driving. If it shines that brightly is their [sic] any chance it could start a fire. A very real concern these days. I'm also reading that environment studies in the area should be made to determine these effects. Since these panels would be installed 20' above the parking lots they would be visible from Linda Vista Ave which is a nationally designated scenic route.. [sic] I'm really

surprised that Pasadena would allow that to happen as we pride ourselves in the historical preservation of our beautiful city.

We live up here because of the growth and beauty of the area. Cutting down 143 trees would directly effect [sic] the area and it's [sic] beauty.

Response to Comment No. 10-2

While the comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the PV solar cells are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 2: Solar Panels, in Section III.B, Topical Responses, of this Final EIR above. The commenter incorrectly identified Linda Vista Avenue as a nationally-designated scenic route. As identified in Section IV.A, Aesthetics, of the Draft EIR, the only designated State scenic highway within the vicinity of the City of Pasadena is Angeles Crest Highway (State Highway 2), located north of both the Hillside Campus and the South Campus in the northwestern portion of the City. Given this distance and since neither campus is within the viewshed of the Angeles Crest Highway, further consideration of this scenic resource is not required. In addition, a portion of State Route 110 (SR-110) from U.S. Highway 101 (US-101) in downtown Los Angeles to Central Pasadena is the Arroyo Seco Parkway, which is designated a State Historic Parkway by the Caltrans. No nationally-designated scenic routes are located in Pasadena. While Linda Vista Avenue was previously designated as State Route 159, this designation was relinquished when the Interstate 210 (I-210) was completed. In addition, The Hillside Campus is at least 100 feet above Linda Vista Avenue at its highest elevation near Interstate 210 (I-210) to the northeast of the Hillside Campus. Based on the vertical and horizontal separation and intervening structures and vegetation between Linda Vista Avenue and the Hillside Campus, the proposed PV solar cells and canopies at the North Lot and South Lot would not be visible from Linda Vista Avenue.

As also discussed in Section IV.A, Aesthetics, of the Draft EIR, the Hillside Campus has limited visibility from the surrounding area due to a dense tree cover along the northern and eastern boundaries of the campus and the topography of the area that naturally blocks views from the west and south toward the Hillside Campus. Although there are intermittent views of the Hillside Campus from areas that are higher in elevation, particularly from the hillside to the north and northeast of the Hillside Campus approximately 0.4 mile away, the proposed improvements within the Hillside Campus are limited to renovations and additions to existing buildings, installation of photovoltaic (PV) solar cells and canopies at the North Lot and South Lot, and modifications to campus access. These improvements would not be visible from adjacent public rights-of-way, such as Lida Street, or from the immediately

adjacent residential area to the north (i.e., along Pegfair Estates Drive). In addition, due to distance, these improvements would not be visually perceptible from those private residences located 0.4 mile to the north and northeast of the campus.

Please refer to Response to Comment No. 8-12 above regarding the removal of trees from the North Lot and South Lot. With regard to reflectivity, as discussed in Topical Response No. 2, modern PV panels reflect as little as 2 percent of incoming sunlight and would be less reflective than the glare from the windshields within the existing surface parking area.

Comment No. 10-3

Increasing the student and staff population by 741 people is absolutely the worst idea for the neighborhood. With only one road up and the increase of cars going up and down Lida would be a nightmare. Lets add alcohol to that picture and you truly have a dangerous situation.

Response to Comment No. 10-3

While the comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding increased on-campus population, traffic, and alcohol consumption are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus. Therefore, the population growth referred to by the commenter would primarily occur on the South Campus. The sale of alcohol would be related to the operation of the ground floor amenities (e.g., on-campus café or restaurant) on the South Campus. Although alcohol would continue to be served at the Hillside Campus at special events, it would not be for sale. Additional information has been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to clarify that alcohol sale would only occur at the South Campus. With regard to traffic noise, as shown in Table IV.J-14 of Section IV.J, Noise, of the Draft EIR, potential impacts associated with traffic noise along Lida Street would be less than significant.

Comment No. 10-4

In summation here are my concerns:

- solar panels installed 20ft [sic] above the north and south parking lots creating solar glare & glint and destroying a national scenic route.

- removing 143 trees
- the increase in campus population by 741 people causing traffic concerns on Lida.

This is a residential area. Please keep Art Center growth limited in our neighborhood maintaining the quality life of residents and the beauty of a national scenic route.

Response to Comment No. 10-4

Please refer to Response to Comment Nos. 8-12, 10-2 and 10-3 above.

Comment Letter No. 11

Barbara Blake
babsblake2@gmail.com

Comment No. 11-1

I was unable to attend the meeting as I am caring for my mother after her recent lower arm amputation.

That said, I want you to know that I am extremely opposed to both the “toxic”/dangerous parts of the Hillside plan and the 8 story building on S Raymond Ave.

Response to Comment No. 11-1

The commenter expresses opposition to the Project but does not address the adequacy of the Draft EIR. The comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 11-2

There is NO need to endanger a residential community, nor the LV/Glendale areas with a highly flammable substance—going along sick [sic] streets and in and out of residential neighborhoods. It could be another disaster like San Bruno, CA. And one that the City of Pasadena, the City Council, and Art Center would be responsible for.

Response to Comment No. 11-2

It is assumed that the commenter is referencing the CNG fueling station that ArtCenter is proposing either at the Hillside Campus or South Campus. While the comment does not address the adequacy of the Draft EIR, the commenter’s concerns regarding the CNG facility are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 11-3

There also is NO precedent for an 8 story building in the S Raymond area. HMH is 6 stories. All others are same or mostly smaller—4 stories. The skyline has already been destroyed along the freeway areas, do not do it on S Raymond. It also is a safety concern

as hook and ladder trucks do not go that high to safely evacuate individuals. Art Center could work with the City and others to obtain and expand north along S Raymond and S Arroyo Parkway... enlarging the campus and going no higher than 4 (or 6 max) stories.

Response to Comment No. 11-3

Refer to pages IV.A-41 through IV.A-45 of Section IV.A, Aesthetics, of the Draft EIR, which demonstrates that the height and massing of the proposed buildings within the South Campus would not result in significant aesthetic impacts. In particular, the existing 1111 Building, although only six stories in height at 96 feet, would be comparable in height to the proposed buildings (i.e., 100 feet). In addition, the buildings would be designed in accordance with PFD requirements to ensure adequate access by PFD during an emergency. The comment regarding expansion north along South Raymond Avenue and South Arroyo Parkway is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 11-4

I fail to believe any EIR reports. The City has shown it is solely interested in money from large projects and seems to had [sic] out variances like they were Halloween candy—except of course the City gets fees for the “candy”.....

Since the City Council completely failed the City when it did not listen to the residents trying to get the Gold Line below grade. Now the City has vastly multiplied the number of occupants, automobiles, and traffic congestion.....

Response to Comment No. 11-4

The commenter expresses negative opinions regarding decisions made by the City Council unrelated to the Project. While this comment does not address the content or adequacy of the Draft EIR, it is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 11-5

Please try to keep the streets at least safe and NOT allow highly combustable [sic]/ dangerous materials to be driven along them.

Response to Comment No. 11-5

It is assumed that the commenter is referencing the use of CNG-fueled shuttles proposed by ArtCenter traveling between the two campuses. While this comment does not

address the adequacy of the Draft EIR, the commenter's concerns regarding CNG use are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above. As indicated therein, the natural gas would be delivered via existing lines and delivery of natural gas via large refueling tankers would not occur.

Comment No. 11-6

Please try to maintain some respect of site line and architecture as well. Pasadena is a treasure trove of fabulous architecture, let's not add more disasters like the home on S Los Robles, and other misfits into our community. Please don't allow monstrously tall development in communities with a lower/more desirable site line. Please show some respect for the city many have called home for decades.....keep it safe and respectful for us.

Response to Comment No. 11-6

The commenter expresses a negative opinion about other projects and development in Pasadena and expresses an opposition to tall development in certain areas. While this comment does not address the content or adequacy of the Draft EIR, it is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 11-7

PS: The Council could also please work with the PPD on the homeless population. There are NUMEROUS homeless living along the freeway—they go through the chain link fencing and directly down to their tents, etc.... They are also a safety risk for fire, and health issues (shall we see what San Diego and Santa Cruz are experiencing....) As we embark on the tourist portion of the year, our streets are lined with homeless living, soliciting folks. It is hard to want to walk into even the market these days..... The City Council needs to help the residents with this issue. Please!

Response to Comment No. 11-7

The comment regarding the City's homeless population is outside the scope of the Project or purview of CEQA. While this comment does not address the content or adequacy of the Draft EIR, it is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 12

Nina Briggs
ninabriggs@gmail.com

Comment No. 12-1

As a Linda Vista resident, I am opposed to Art Center’s proposal of “a compressed natural gas (CNG) fueling facility near the new Commuter Services and Facilities Hub at the expanded South Building” on the North Campus on Lida Street.

Response to Comment No. 12-1

While this comment does not address the adequacy of the Draft EIR, the commenter’s opposition to a CNG fueling facility on the Hillside Campus is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 12-2

If “Alternative 4: Change in Location of the New Commuter Services and Facilities Hub to the North Lot Alternative” eliminates the North Campus proposed CNG facility, it would be preferable and eliminate the potential explosive danger to our neighborhood, designated by CAL FIRE as a Very High Fire Hazard Severity Zone (VHFHSZ), requiring mitigation strategies to reduce the ignition potential to buildings in the wildland-urban interface zones. The potential toxic leaks, the infrastructure, storage vessels, delivery, and dispensers required for CNG stations are inappropriate and potentially disastrous to this residential neighborhood and its over 7,000 households.

Response to Comment No. 12-2

Alternative 4 would also include the potential to locate a CNG facility adjacent to the new Commuter Services and Facilities Hub. Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 12-3

Please do not approve this component of the Art Center College of Design Master Plan for its dangerous environmental impact.

Response to Comment No. 12-3

The commenter's opposition to the CNG fueling facility on the Hillside Campus is noted for the administrative record and will be forwarded to the decision-makers for consideration.

Comment Letter No. 13

John Callas
1560 Scenic Drive
Pasadena, CA 91103-1937

Comment No. 13-1

I write today to object to a few elements of the Art Center College of Design Master Plan as described in the draft Environmental Impact Report (EIR). The construction of 8-story buildings on the South Raymond campus are too high. These structures would dominate the skyline and take Pasadena from a residential city to an urban landscape.

Response to Comment No. 13-1

The commenter's objection to the height of the buildings proposed at the South Campus is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

While this comment does not address the adequacy of the Draft EIR, it should be noted that the existing 1111 Building is already 96 feet in height, which would be comparable to the heights of the proposed new buildings on the South Campus, and currently partially blocks views of the San Gabriel Mountains in the background from SR-110. Although existing uses in the vicinity of the South Campus primarily consist of low-rise structures with a few mid-rise buildings at the South Campus and the Huntington Memorial Hospital campus, the South Campus is situated in a heavily urbanized portion of the City that is characterized by a wide range of uses, including commercial and light industrial uses; offices, medical, and institutional uses; and Pasadena Water and Power's Broadway/Glenarm Power Plant, which is located to the south of the South Campus across Glenarm Street. In particular, the Glenarm Power Plant operates steam generator stacks and cooling towers that are over 100 feet in height. In addition, further north along Arroyo Parkway, the mixed-use buildings at the Metro Gold Line Del Mar Station consist of seven- to eight-story buildings, which would be comparable to the heights of the proposed new buildings.

Comment No. 13-2

Further, the installation of a "digital gallery" (giant video screen) on the side of one of the buildings at the south campus would be a distraction and an eye sore. Video screens draw too much attention from motorist (versus a plain billboard). This creates a driving risk. And such video screens completely change the character of the community from a quiet residential community to an unpleasant media scene.

Response to Comment No. 13-2

Impacts regarding potential traffic hazards related to the operation of the digital gallery have been addressed in the Draft EIR. As identified in Section IV.L, Traffic, of the Draft EIR, if the digital gallery were located at the southeastern corner of the building, at the Glenarm Street, SR-110/Arroyo Parkway intersection, it could potentially be located behind the traffic signals, thereby conflicting with PMC Section 12.15.050, creating confusion, which may lead to hazardous driving conditions. However, implementation of Mitigation Measure L-1 would be required to ensure that the potential impact related to the operation of the digital gallery on the eastern façade of the 1111 Building is reduced to a less-than-significant level. This mitigation measure would involve review by the Pasadena DOT and other relevant agencies, such as Caltrans.

Potential aesthetic impacts associated with the digital gallery are fully addressed in Section IV.A. Aesthetics of the Draft EIR. As concluded therein, the digital gallery would not be detrimental to the visual quality or character of the South Campus or surrounding area.

Comment No. 13-3

There is also a request in the EIR for a conditional use permit to serve alcohol. Alcohol has no place in an education setting. It sends the wrong message and creates a dangerous precedent that has lifelong implications for young students.

Response to Comment No. 13-3

While the comment does not address the adequacy of the Draft EIR, the commenter's concern regarding alcohol sales noted for the administrative record and will be forwarded to the decision-makers for review and consideration. To clarify, the sale of alcohol would be related to the operation of the ground floor amenities (e.g., on-campus café or restaurant) on the South Campus. Although alcohol would continue to be served at the Hillside Campus at special events, it would not be for sale.

Comment No. 13-4

I oppose the issuing of any permit to proceed that contains these elements.

Thank you for your attention to this important issue.

Response to Comment No. 13-4

The commenter's opposition to the building height, digital gallery, and sale of alcohol is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 14

Gennia Cui
thegennia@gmail.com

Comment No. 14-1

I'm a property owner on Pegfair Estates Dr, off of Lida. I heard about the changes Art Center is planning to make to their hillside campus, including increasing the student and faculty population and serving alcohol. I'm concerned about the impact this will have on our safety and property value. Right now, many Art Center students already speed down Lida with disregard for the speed limit. This is dangerous for families walking, biking, and driving. The noise of zooming cars and motorcycles are also terrible and we can hear them clearly even with our windows closed. I imagine it will worsen exponentially when the population increases and alcohol becomes readily available. Please consider the impact this will have on the residents as you review the master plan.

Response to Comment No. 14-1

As described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus. Therefore, the population growth referred to by the commenter would primarily occur on the South Campus. The sale of alcohol would be related to the operation of the ground floor amenities (e.g., on-campus café or restaurant) on the South Campus. Although alcohol would continue to be served at the Hillside Campus at special events, it would not be sold. Additional information has been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to clarify that alcohol sale would only occur at the South Campus. With regard to traffic noise, as shown in Table IV.J-14 of Section IV.J, Noise, of the Draft EIR, potential impacts associated with traffic noise along Lida Street would be less than significant.

Comment No. 14-2

The CNG facility is also concerning because of the potential dangers associated with it. But I understand it would decrease carbon footprint of the increased population. Are alternative energy saving solutions, like electric vehicles, being considered?

Response to Comment No. 14-2

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the CNG facility are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above.

ArtCenter is considering the use of electric vehicles in the future; however, the Project, as currently proposed, would involve the use of CNG shuttles.

Comment No. 14-3

I attended Art Center not too long ago and it's actually the reason I moved to the community. So I'm supportive of the school expanding. But I hope the school and the city of Pasadena will carefully consider the safety and wellbeing of the residents as well.

Thank you very much!

Response to Comment No. 14-3

While this comment does not address the content or adequacy of the Draft EIR, it is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 15

Joanna Davies
jdavies@usc.edu

Comment No. 15-1

As a resident who lives off of Linda Vista Rd. I am shocked to JUST be hearing of the planned expansion of your campus. This is a residential community, your campus should probably never have bbeen [sic] allowed to be here in the first place.

Response to Comment No. 15-1

While this comment does not address the content or adequacy of the Draft EIR, the commenter's opposition to the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 15-2

We do not need more traffic, risky CNG facility, alcohol served on the campus, and further building and students/faculty.

Response to Comment No. 15-2

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding traffic, CNG facility and alcohol use are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus. Therefore, the population growth referred to by the commenter would primarily occur on the South Campus. The sale of alcohol would be related to the operation of the ground floor amenities (e.g., on-campus café or restaurant) on the South Campus. At the Hillside Campus, although alcohol would continue to be served at special events, it would not be for sale. Additional information has been included in Section II, Clarifications, Revisions, and Corrections to the Draft EIR, of this Final EIR to clarify that alcohol sale would only occur at the South Campus.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 15-3

How did this get this far in planning without residents like myself being informed ?

Response to Comment No. 15-3

As required by CEQA, a Notice of Preparation (NOP) was circulated in September 2016, to receive input from interested public agencies and private parties on the scope of the EIR. The City also held two scoping meetings during the NOP comment period—a community meeting on September 20, 2016, and a second one before the City Planning Commission on September 28, 2016, to solicit comments and to inform the public of the Project and the EIR. Separate from these CEQA-related meetings, below is a list of groups ArtCenter has presented to, and meetings ArtCenter has hosted, since mid-2015 up until the Draft EIR was released:

- Linda Vista Annandale Association (June 23, 2015)
- Master Plan Community Kickoff (November 12, 2015)
- West Pasadena Residents Association (February 3, 2016, May 18, 2016, May 3, 2017)
- Council District 7 Meeting (March 9, 2016)
- Council District 6 Meeting (June 23, 2016)
- Glenarm Power Plant Public Art Stakeholders (August 2016)
- Metro Gold Line “State of the Project” presentation (October 14, 2016)
- Pasadena Complete Streets Coalition (October 18, 2016)
- City-sponsored Community Meeting: Hillside Campus (November 17, 2016)
- City-sponsored Community Meeting: South Campus (November 29, 2016)
- Madison Heights Homeowners Association (May 23, 2017)

In addition, Master Plan was presented to the City Council as an information item on June 8, 2015, and to the Design Commission for preliminary review on February 3, 2015, and November 10, 2015.

The commenter noted that she lives off of Linda Vista Road. As noted above, the Linda Vista–Annandale Association, which encompasses the commenter’s residence, was

made aware of the project and was notified by the City of the Project and the preparation of the EIR.

Comment Letter No. 16
Maria & Joseph F. DiMassa
jfdimassa@gmail.com

Comment No. 16-1

We are long time residents of Pasadena, residing within 100 yards of the Art Center for the past 43 years. There were significant objections from Linda Vista residents over 40 years ago when the North Campus of the Art Center was built.

We now see that further encroachments on our neighborhood are planned by the Art Center.

Response to Comment No. 16-1

While this comment does not address the adequacy of the Draft EIR, it is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As described in Section II, Project Description, of the Draft EIR, the Project would focus growth on the South Campus, while providing for infrastructure improvements and building renovations on its Hillside Campus. Specifically, within the Hillside Campus, improvements would include renovations and additions to existing buildings, additional parking, installation of PV solar cells and canopies over the existing surface parking stalls, and modifications to campus access. No improvements to the undisturbed portions of the Hillside Campus north of Lida Street are proposed. A small portion of the base of the slope to the rear of the South Building in the South Lot may be temporary encroached upon during Project construction, but no other areas outside of the existing footprint of developed and paved areas of the Hillside Campus would be disturbed by the Project.

Comment No. 16-2

We object to the following items in the Art Center Master Plan

1. The solar panels that are proposed for the parking lots would result in solar glare that would severely impact our property and negatively effect [sic] our visibility.

Response to Comment No. 16-2

While this comment does not address the adequacy of the Draft EIR, the commenter's objection to the solar panels is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 2: Solar Panels, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 16-3

2. The CNG facility that is proposed represents a serious threat to our neighborhood. The possibility of leaks and/or explosions represent a real threat to our neighborhood, esp. to the chaparral that would provide tinder for wildfires. It seems to us that the potential liability to both the Art Center and the City of Pasadena would be reason enough to deny this part of the Plan.

Response to Comment No. 16-3

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the CNG facility are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility, in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 16-4

3. The increase in the population (staff and students) should not be permitted. We already have a significant problem with traffic on Lida during the day and night due to Art Center population.

Response to Comment No. 16-4

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding increased on-campus population and traffic are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus. Therefore, the increase in population referred to by the commenter would primarily occur on the South Campus. As discussed in Response to Comment No. 16-1 above, improvements to the Hillside Campus would be limited to renovations and additions to existing buildings, additional parking, installation of PV solar cells and canopies over the existing surface parking stalls, and modifications to campus access within the existing footprint of developed and paved areas of the Hillside Campus.

Comment No. 16-5

4. No alcohol permit should be allowed.

Response to Comment No. 16-5

While this comment does not address the adequacy of the Draft EIR, the commenter's opposition to the sale of alcohol is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 16-6

5. The building of a two story building will seriously damage the view of the hillside and alter the nature of what is now pristine natural space. It will also impact the wildlife that is abundant in this area.

Response to Comment No. 16-6

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the new Commuter Services and Facilities Hub are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The proposed two-story building would be located near the southwestern corner of the South Lot enclosed on three sides (the southern, western, and northern sides) by a natural slope with the eastern side (i.e., building frontage) open to the South Lot. With the dense vegetation on the Hillside Campus, very few vantage points from the surrounding area would have a direct line-of-sight of the proposed building. As discussed in Response to Comment Nos. 16-1 and 16-4 above, only a small portion of the base of the slope to the rear of the South Building in the South Lot may be temporary encroached upon during Project construction, but no other areas outside of the existing footprint of developed and paved areas of the Hillside Campus would be disturbed by the Project to affect the natural space in the vicinity of the Hillside Campus.

Comment Letter No. 17

Donna & Douglas Gerry
1519 Arroyo View Drive
Pasadena, CA 91103-1904

Comment No. 17-1

We have heard through neighbors that the Art Center has made some proposals for upgrades to the Hillside Campus. We have been unable to locate the specific Master Plan online that details these proposals, and would like to request a link to review it please.

Response to Comment No. 17-1

While this comment does not address the adequacy of the Draft EIR, it is noted for the administrative record and will be forwarded to the decision-makers for review and consideration

The Draft EIR prepared for the Project and associated documents are available at www.cityofpasadena.net/planning/art-center-college-of-design-master-plan/. This link was provided to the commenter.

Comment No. 17-2

We have been residents of Linda Vista for over 15 years, and if the proposals we have seen are accurate, we are strongly opposed to a CNG storage site and solar panel installation at the Hillside Campus at the Art Center that would remove 143 trees. One of the beautiful aspects of the neighborhood is to view the hills and see green trees. We are all in favor of solar power but we are firmly against removing trees to install solar panels. It seems much more logical to install the panels on top of existing buildings or above existing parking lots.

Response to Comment No. 17-2

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding CNG use and the solar panels are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility and Topical Response No. 2: Solar Panels in Section III.B, Topical Responses, of this Final EIR above.

The solar panels are proposed above existing parking lots (i.e., North Lot and South Lot). As discussed in Response to Comment No. 8-12, although the Project would involve the removal of a total of 148 trees, 45 trees from the North lot and 103 trees from the South Lot to accommodate the installation of the PV solar cells and canopies, only one tree (Aleppo pine, a Specimen tree) on the North Lot is a protected tree defined by the City's Tree Ordinance. As discussed in Page IV.C-20 of Section IV.C, Biological Resources, of the Draft EIR, the Project would be required to comply with the City's Trees and Tree Protection Ordinance, which requires a Private Tree Removal Permit and replacement trees. Per the ordinance, the number and species of replacement trees is based on the diameter at breast height (DBH) and the species of the removed trees. In addition, the trees removed as a result of installation of the solar panels within the surface parking areas would be replaced on a one-to-one basis by the Applicant. Accordingly, the number of trees on the Hillside Campus would not be reduced.

Comment No. 17-3

And we don't think the Hillside campus is a good location for a CNG facility. This is a residential area, not an industrial one. There are many potential dangers to this proposal. At the South campus, there are gas stations and Propane stations within a few hundred feet—that would be a much better location to install a CNG facility (On Raymond Avenue or Arroyo Parkway).

Response to Comment No. 17-3

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the CNG facility are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 17-4

Please consider our concerns and our desire to keep our neighborhood green and safe. While we are very happy to have the Art Center as members of our neighbourhood, [sic] surely there are better ways to encourage environmental improvements that would enhance the natural aspects of our community.

Response to Comment No. 17-4

While this comment does not address the content or adequacy of the Draft EIR, the commenter's concerns are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 18

Steve Handy
stevedhandy@gmail.com

Comment No. 18-1

I am a neighbor and disapprove the cutting down of 143 trees. Please add me to your email listing so I can attend future meetings, etc.

Response to Comment No. 18-1

While this comment does not address the adequacy of the Draft EIR, the commenter's disapproval of the removal of trees from the Hillside Campus is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The commenter has been added to the e-mail notification list for the Project.

Please also refer to Response to Comment No. 8-12.

Comment Letter No. 19

Mic Hansen
mic.hansen@icloud.com

Comment No. 19-1

Thank you for the opportunity to comment on the Art Center College of Design Draft EIR. In the interest of brevity, I have chosen to comment on only one aspect of the DEIR that I found particularly troublesome. I am reacting to the description found on page iii-21 of the document regarding the digital display that is proposed. If I am interpreting the description for “improvements” to the 1111 building correctly, as quoted below, the installation would conflict with Pasadena’s sensibilities and guidelines.

“A digital gallery, which would comprise approximately 8,000 square feet of screen area, would be located between the northeastern corner and southwestern corner of the 1111 Building and mainly oriented toward Arroyo Parkway.”

I am understanding that the façades of the building facing Arroyo Parkway and Glenarm Street will become a giant digital LED display? In addition to showing student art, will this also display commercial messaging for the institution? In effect, a giant 6-7 storey [sic] two-sided perpetually-lit electronic billboard?

If my interpretation is accurate, the entrance/gateway to Pasadena from the South will become a more intense version of L.A. Live or Picadilly [sic] Circus. This type of electronic display is the antithesis of Pasadena aesthetic values, and is not in keeping with our restrained and understated signage guidelines. Art Center may argue that this type of digital display is public art; however, the scale and the exterior public nature of such subjective, idiosyncratic, and enforced display for the consumption of all seems misguided at best, and offensive. Potentially, it may also prove to be a safety hazard, with intense multicolor lighting suddenly distracting motorists at the terminus of the Arroyo Parkway.

This display may be suitable if located on an exterior wall facing the interior of the campus, but should not be obligatory and inescapable viewing imposed upon every Pasadena community member and visitor. As is usually the case, less is more.

Response to Comment No. 19-1

Pages IV.A-45, IV.A-46, IV.A-49 in Section IV.A, Aesthetics, of the Draft EIR addressed the impacts of the proposed digital gallery as it relates to visual and architectural

character of the surrounding area, consistency with the long range vision of the General Plan, and lighting/illumination. The Draft EIR acknowledged that the digital gallery is not a typical feature in Pasadena; however, the location is within an active portion of Pasadena that serves as a gateway to the City. As identified in the Draft EIR, the digital gallery would support Policy 4.9 (Gateways) of City's Land Use Element of the General Plan by defining a prominent entry point into Pasadena with a distinctive feature. This policy specifically encourages light elements. It would support Policy 37.4 (South Fair Oaks Avenue) by adding to the visual variety to contribute to the distinctive characteristics of the area's intended artistic, cultural, and creative businesses.

In addition, surrounding the South Campus on Arroyo Parkway are a mix of utilitarian buildings and uses, notably the Glenarm Power Plant, a vehicle service station, an advertising billboard, and the Los Angeles Cold Storage building to the immediate north. This collection of disparate uses creates a varied aesthetic character of minimal quality with no defining attributes; as such, there are no notable visual resources in the Project area. The South Campus is not within a historic district or landmark district, and there are no historic resources in the vicinity. As such, the digital gallery would not conflict with the visual quality or character of the South Campus or surrounding area. With regard to the digital gallery and traffic safety, as set forth on pages IV.L-28 and IV.L-31 of Section IV.L, Traffic, of the Draft EIR, with implementation of a mitigation measure regarding location and review of the digital gallery by DOT, potential traffic safety impacts of the digital gallery would be less than significant.

Comment No. 19-2

Thank you for your consideration of these comments and adding them to the record.

In addition, the following West Pasadena neighbors concur with these comments, and have requested that their names be added in support.

Dan Beal
Avram Gold
Joan Hearst
Bill Urban
Linda Zinn

Response to Comment No. 19-2

The comments above, as well as the names of the West Pasadena neighbors identified above, are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 20

Patricia Hill
trish0@dslextre.me.com

Comment No. 20-1

I would like to address several issues in regard to the changes that are proposed for the Art Center College of Design. I am Pat Hill, a lead for the Glendale Highlands Neighborhood Watch directly north of the campus.

1. Since we are a “view” neighborhood, many of our homes would be impacted by the solar panels that I see described in the master plan as reflecting less light than steel or glass. That is considerable glare and would not only impact our property values but esthetically be detrimental.

Response to Comment No. 20-1

While this comment does not address the adequacy of the Draft EIR, the commenter’s concerns regarding the solar panels are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 2: Solar Panels in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 20-2

2. The increased traffic, especially through the Pasadena segment of houses, would impact residents with the increased enrollment.

Response to Comment No. 20-2

While this comment does not address the adequacy of the Draft EIR, the commenter’s concerns regarding increased traffic and enrollment are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus. Therefore, the increased enrollment referred to by the commenter would primarily be situated on the

South Campus. The Project would increase the number of shuttles between the two campuses and their frequency to ensure that ArtCenter-related traffic is minimized.

Comment No. 20-3

3. Most importantly I am vehemently opposed to the installation of a CNG (compressed natural gas) facility at the campus. It is a cheap alternative to liquid gas but is even more dangerous. There is a reason that CNG is not used widespread because of its volatility. Gas is compressed to 1% of its natural volume, so that when there is an accident or corrosion, etc. it doesn't leak, it EXPLODES. Stations are typically not placed in neighborhoods but rather commercial or industrial areas.

It's like having bombs in our neighborhood and we don't want it for our own safety. Any fireman would tell you that he/she would not want them in their neighborhood. In addition to the fact, that we live in a highly dangerous fire zone.

Also it should be noted that neighbors would not like compressed gas being trafficked through their neighborhood to the Art Center. You may contend that it is safe, but it only takes ONE accident and that is too much. Fire would spread quickly and it would also put a strain on our fire fighting facilities.

Response to Comment No. 20-3

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the CNG facility are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 20-4

Another point of contention is that the Art Center already has volatile substances on campus such as paints and photographic fluids, so combined with that it would be catastrophic.

Response to Comment No. 20-4

The commenter asserts that the use of volatile substances along with the operation of the CNG facility would have catastrophic effects without providing any supporting evidence. The delivery, handling, use, and disposal of hazardous materials are heavily regulated. As identified in Section G, Hazards and Hazardous Materials, of the Draft EIR,

all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable federal, state, and local standards and regulations. Any risks associated with these materials would be adequately reduced to a less-than-significant level through compliance with these standards and regulations.

Comment No. 20-5

These changes would roughly affect 7,000 households in the immediate vicinity, Pasadena and Glendale combined. Please do not allow this to happen. There is a reason that lawyers file lawsuits about CNG incidents because it is DANGEROUS.

Thank you for your time and attention.

Response to Comment No. 20-5

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the CNG facility are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 21

Darlene Hubanks
dhubanks@aol.com

Comment No. 21-1

I am writing in regard to the additions and renovations to the Art Center College of Design. Since I live close to this facility, the addition of compressed gas concerns me. Keeping in mind that this is an impacted residential area as well as a high risk fire terrain, the addition of such a volatile element seems quite dangerous. Hopefully, the community will have an opportunity to the project fully vetted.

Response to Comment No. 21-1

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding the CNG facility are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above.

Comment Letter No. 22

Nanette Karapetian
nanettek321@gmail.com

Comment No. 22-1

I am a neighbor and significantly disapprove of art center [sic] cutting down 143 trees by my home.

Response to Comment No. 22-1

While this comment does not address the adequacy of the Draft EIR, the commenter's disapproval of the tree removal is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

It should be noted that although the Project would involve the removal of a total of 148 trees, 45 trees from the North lot and 103 trees from the South Lot to accommodate the installation of the PV solar cells and canopies, only one tree (Aleppo pine, a Specimen tree) on the North Lot is a protected tree defined by the City's Tree Ordinance. As discussed in Page IV.C-20 of Section IV.C, Biological Resources, of the Draft EIR, the Project would be required to comply with the City's Trees and Tree Protection Ordinance, which requires a Private Tree Removal Permit and replacement trees. Per the ordinance, the number and species of replacement trees is based on the diameter at breast height (DBH) and the species of the removed trees. In addition, the trees removed as a result of installation of the solar panels within the surface parking areas would be replaced on a one-to-one basis by the Applicant. Accordingly, the number of trees on the Hillside Campus would not be reduced.

Comment Letter No. 23

Tim Martinez
1404 Chamberlain Road
Pasadena, CA 91103-2312

Comment No. 23-1

The following are my comments for the Art Center DEIR:

Regarding the plant species list in Appendix D, Attachment B:

- *Alnus* sp. (Alder trees) is listed as “unknown” Native/Non-native status. I have observed our native White Alder (*Alnus rhombifolia*) in the canyons (“Drainage areas”, pg. 17) east of the two parking lots.
- *Cuscuta* sp. (dodder) is classified as “unknown” Native/Non-native status. The plant observed was almost certainly *Cuscuta californica*, which is a native species.
- *Opuntia* sp. (prickly pear cactus) was observed, and classified as “non-native.” While there could be non-native *Opuntia* species on-site, I have observed stands of native *Opuntia* (likely *Opuntia littoralis*) within the “Disturbed Chaparral” project areas.
- *Quercus agrifolia* (coast live oak) is listed, but there is no mention of the Scrub oak (*Quercus berberidifolia*) Elfin forest which dominates the hillsides in the “*Quercus Agrifolia* and *Heteromeles Arbutifolia* Woodland Alliance”, [sic] “*Quercus Agrifolia* Woodland Alliance”, [sic] and “Disturbed Chaparral” project areas.

Response to Comment No. 23-1

Plants were identified to genus when it was not possible to access an area during the biological reconnaissance survey, which was conducted in October 2016, because of steep topography or where the appropriate parts of the plants were not available. Accordingly, as this was the case for the species listed by the commenter, they were only identified to genus. Although these species may in fact be those suggested by the commenter, because they were not positively identified as such during the biological reconnaissance survey, the identification of these species will remain as listed.

Scrub oak was not identified within the limits of the BSA during the biological reconnaissance survey. Most of the vegetation communities were classified according to

the National Vegetation Classification System (NVCS). The NVCS defines vegetation alliances based on the dominant growth forms that exhibit similar composition in the uppermost vegetation layer. Therefore, because *Quercus agrifolia* and *Heteromeles arbutifolia* dominated the areas within the BSA, “*Quercus Agrifolia* and *Heteromeles Arbutifolia* Woodland Alliance” and “*Quercus Agrifolia* Woodland Alliance” were used to classify the vegetation communities within the appropriate sections of the BSA. In addition, Scrub Oak Elfin Forest is not a known NVCS classification, and scrub oak was not the dominant species in the areas classified as Disturbed Chaparral.

Comment No. 23-2

Regarding wildlife, I have observed the following species within the project area that were not listed:

- Coyote (*Canis latrans*)
- Bobcat (*Lynx rufus*)
- Red-tailed hawk (*Buteo jamaicensis*)
- Rattlesnakes (*Crotalus* sp.)

Response to Comment No. 23-2

The list of species identified in Section IV.C, Biological Resources, of the Draft EIR and in the Biological Resources Assessment (Appendix D of the Draft EIR) only included species that have been observed during the biological reconnaissance survey conducted in October 2016. Since the species mentioned above were not observed during the biological reconnaissance survey, they were not included on the species observed list. The species observed list is not a conclusive list of all species that could be in the Project area.

Comment No. 23-3

I would also like to comment on the “Drainage” areas depicted on page 17, Appendix D.

Section 4.4 Hydrology, on page 21 states that:

“During construction of the Hillside Campus in 1976, the BSA was graded to create pads for buildings, parking lots, and other campus amenities. Some of the natural canyon drainages within the BSA were replaced with concrete drains and the drainage pattern of the site was modified.”

This section continues to describe that only one of the two “Drainages” shown on page 21 is mapped as riverine within the BSA. Wetland indicator species were found, however when a sample pit was excavated within the drainage to test for hydric soils, none were identified. It was then concluded that:

“...therefore, it is likely that the drainage does not sustain water for 14 consecutive days, and the hydrology indicator required for USACE wetlands is not present. Because the drainage does not satisfy the USACE’s 3-parameter wetland definition it would not be considered a wetland under jurisdiction of the USACE.”

I remember year-round surface flows of water present at both “Drainages” for years, (approximately from 1997–2006). Where have these surface flows gone? Has some previous development within the BSA or the project area diverted or impeded their flow? Are environmental factors of drought to blame? Can anything be done to restore the flow of water?

This is something I would like addressed in the FEIR.

Response to Comment No. 23-3

During the biological reconnaissance survey conducted in October 2016, a soil pit was excavated to test for hydric soils within the drainage behind the South Building. Hydric soils were not identified. If year-round surface flows had been present during recent years, there would have been sufficient time for hydric soils to form. In addition, indicators of wetland hydrology (i.e., surface flows, saturated soils, drift lines on vegetation, etc.) were not identified during the survey. Southern California experienced drought conditions between 2011 and 2017, which caused reductions in surface flows throughout the region. Any restoration of surface flow is dependent upon environmental conditions (i.e., heavy precipitation). It should be noted that Section 15125(a) of the CEQA Guidelines states that the physical environmental conditions as they exist at the time the Notice of Preparation (NOP) is published will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. This section of the CEQA Guidelines further states that the description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives. In the case of the Project, the NOP was published on September 2, 2016, which was around the time the biological reconnaissance survey was conducted. Accordingly, baseline has been established as late 2016 when hydric soils were not identified.

Comment No. 23-4

I would also like to comment on the mitigation for the proposed removal of 148 trees. Any new trees planted for mitigation should be native tree species that provide similar habitat benefits as the undeveloped habitat communities of the Hillside Campus.

Additionally, many of the ornamental plant species identified within the BSA are invasive species, which negatively impact the surrounding natural habitat areas, and which can pose a fire hazard. I propose that all new ornamental plantings consist of regionally-appropriate and fire-resistant native species.

Response to Comment No. 23-4

As discussed under Impact C-4 on page IV.C-20 in Section IV.C, Biological Resources, of the Draft EIR, the Project would be required to comply with the City's Trees and Tree Protection Ordinance, which requires a Private Tree Removal Permit and replacement trees or payment of compensatory fees up to 50 percent of the required number of replacement trees. Per the ordinance, the number and species of replacement trees is based on the diameter at breast height (DBH) and the species of the removed trees. Accordingly, some trees would be replanted on the Hillside Campus in compliance with City requirements.

Comment Letter No. 24

Patricia Wells McMillan
pwellsmc@gmail.com

Comment No. 24-1

Many impacts on the LINDA Vista area.

The traffic has already increased.

741 new PEOPLE!

Response to Comment No. 24-1

While this comment does not address the adequacy of the Draft EIR, the commenter's opposition to the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus. Therefore, the population growth referred to by the commenter would primarily occur on the South Campus. The Project would increase the number of shuttles between the two campuses and their frequency to ensure that ArtCenter-related traffic is minimized.

Comment No. 24-2

143 TREES destroyed?

Response to Comment No. 24-2

While this comment does not address the adequacy of the Draft EIR, the commenter's disapproval of the tree removal is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

It should be noted that although the Project would involve the removal of a total of 148 trees, 45 trees from the North lot and 103 trees from the South Lot to accommodate the installation of the PV solar cells and canopies, only one tree (Aleppo pine, a Specimen tree) on the North Lot is a protected tree defined by the City's Tree Ordinance. As discussed in Page IV.C-20 of Section IV.C, Biological Resources, of the Draft EIR, the Project would be required to comply with the City's Trees and Tree Protection Ordinance,

which requires a Private Tree Removal Permit and replacement trees. Per the ordinance, the number and species of replacement trees is based on the diameter at breast height (DBH) and the species of the removed trees. In addition, the trees removed as a result of installation of the solar panels within the surface parking areas would be replaced on a one-to-one basis by the Applicant. Accordingly, the number of trees on the Hillside Campus would not be reduced.

Comment No. 24-3

My vote goes to NO.

Actually surprised that Art Center shows no concern for their neighbors.

Response to Comment No. 24-3

While this comment does not address the content or adequacy of the Draft EIR, the commenter's opposition to the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 25

Debbie Mitchell
1199 Yocum Street
Pasadena, CA 91103-1944

Comment No. 25-1

I am opposed to the increase of any additional headcount at the Art Center ~ Hillside. [sic] I live on Yocum and the traffic on Linda Vista is already horrible, especially at the intersection of Lida and Linda Vista.

Response to Comment No. 25-1

While this comment does not address the adequacy of the Draft EIR, the commenter's opposition to the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus. Therefore, the population growth referred to by the commenter would primarily occur on the South Campus. The Project would increase the number of shuttles between the two campuses and their frequency to ensure that ArtCenter-related traffic is minimized.

Comment No. 25-2

I am also opposed to the removal of any trees, especially in the Hillside Ordinance area.

Response to Comment No. 25-2

It is assumed that the commenter is referencing Chapter 17.29 of the Pasadena Zoning Code regarding the Hillside Overlay Districts. As discussed in Response to Comment No. 8-12, although the Project would involve the removal of a total of 148 trees, 45 trees from the North lot and 103 trees from the South Lot to accommodate the installation of the PV solar cells and canopies, only one tree (Aleppo pine, a Specimen tree) on the North Lot is a protected tree defined by the City's Tree Ordinance. As discussed in Page IV.C-20 of Section IV.C, Biological Resources, of the Draft EIR, the Project would be required to comply with the City's Trees and Tree Protection Ordinance, which requires a Private Tree Removal Permit and replacement trees. Per the ordinance, the number and species of replacement trees is based on the diameter at breast height (DBH) and the species of the removed trees. In addition, the trees removed as a result of installation of the solar panels within the surface parking areas would be replaced on a

one-to-one basis by the Applicant. Accordingly, the number of trees on the Hillside Campus would not be reduced.

Comment No. 25-3

I am opposed to the CNG facility which is a huge risk for personal safety.

Response to Comment No. 25-3

While this comment does not address the adequacy of the Draft EIR, the commenter's opposition to the CNG facility is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 25-4

Most importantly, I do not feel the Art Center should be permitted to sell any alcohol. The location of the school with so many young children in the nearby neighborhood poses a huge safety concern with the increased number of impaired drivers.

Response to Comment No. 25-4

While this comment does not address the adequacy of the Draft EIR, the commenter's concerns regarding alcohol consumption are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The sale of alcohol would be related to the operation of the ground floor amenities (e.g., on-campus café or restaurant) on the South Campus. Although alcohol would continue to be served at the Hillside Campus at special events, it would not be for sale.

Comment Letter No. 26

Robert Morris
1192 Rancheros Place
Pasadena, CA 91103-2753

Comment No. 26-1

We fully support the proposed changes proposed by the Art Center. This college is a wonderful institution for Pasadena.

Response to Comment No. 26-1

The commenter expresses his support for the Project. While the comment does not address the content or adequacy of the Draft EIR, the commenter's support for the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 27

Jim O’Kane
jvokane@gmail.com

Comment No. 27-1

“NIMBY” mentality—let them move forward with the project—it’s a prudent way to decrease their carbon foot print [sic]

Response to Comment No. 27-1

The commenter expresses his support for the Project. While the comment does not address the content or adequacy of the Draft EIR, the commenter’s support for the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 28

Jim O'Kane
jvokane@gmail.com

Comment No. 28-1

I see no reason why with proper monitoring it would not be permissible to serve alcohol at the Art Center. Last time I checked alcohol was legal substance to serve in the U.S.

Response to Comment No. 28-1

While the comment does not address the adequacy of the Draft EIR, the commenter's support for the sale of alcohol at ArtCenter is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 29

Kathleen O’Kane
oakgrove@pacbell.net

Comment No. 29-1

I would like to address several issues in regard to the changes that are proposed for the Art Center College of Design. I am Kathleen O’Kane, and live on Linda Vista.

1. The increased traffic, especially on Linda Vista would impact residents with the increased enrollment. Eliminate parking at the hillside campus and require that those at the campus use the shuttle or park at the Rose Bowl.

Response to Comment No. 29-1

While this comment does not address the adequacy of the Draft EIR, the commenter’s opposition to the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

As described in Section III, Project Description, of the Draft EIR, ArtCenter proposes to implement a 15-year Master Plan that focuses growth on its South Campus. Therefore, the population growth referred to by the commenter would primarily occur on the South Campus. The Project would increase the number of shuttles between the two campuses and their frequency to ensure that ArtCenter-related traffic is minimized.

Comment No. 29-2

2. I am opposed to the installation of a CNG (compressed natural gas) facility at the campus. There is a reason that CNG is not used widespread because of its volatility. Stations are typically not placed in neighborhoods but rather commercial or industrial areas. In addition to the fact, that we live in a highly dangerous fire zone. Also it should be noted that neighbors would not like compressed gas being trafficked through their neighborhood to the Art Center. You may contend that it is safe, but it only takes ONE accident and that is too much. Fire would spread quickly and it would also put a strain on our fire fighting facilities.

Please do not allow this to happen. CNG incidents are DANGEROUS and Art Center Students and staff can purchase their fuel where everyone else does not in a fire area in Linda Vista.

Thank you in advance for you [sic] consideration.

Response to Comment No. 29-2

While this comment does not address the adequacy of the Draft EIR, the commenter's opposition to the CNG facility is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above.

Comment Letter No. 30 [Late Comments]

Joseph F Paggi, Jr.
747 S. Madison Ave.
Pasadena, CA 91106

Sharon Freeark
sharon@success-reps.com

Comment No. 30-1

[Email Correspondence from Joe F. Paggi, Jr. to Council District 7]

My concern is that this maybe one more visual distraction to the thousands of drivers that pass through this intersections which is the South Entrance/ North Terminus of the Pasadena Freeway. Given the rising number of accidents caused by the use of mobile devices while driving, I believe that this digital animated platform could be a major distractive contribution to the safety of both pedestrian and vehicular traffic.

While I like the idea of making the intersection more attractive, I believe the consequences of such a visual exhibit may have dangerous consequences.

[Additional comment from Sharon Freeark in response to Joe F. Paggi, Jr.]

Agreed. And Arroyo Parkway is not Sunset Blvd!

Response to Comment No. 30-1

As discussed on pages IV.L-28, IV.L-29 and IV.L31 of Section IV.L. Traffic of the Draft EIR, Mitigation Measure L-1 includes specific requirements regarding the location of the digital gallery and also requires that the digital gallery be further reviewed by the Pasadena Department of Transportation and relevant agencies. Implementation of this mitigation measure would ensure that the digital gallery complies with PMC Section 12.15.050, which addresses the potential conflict of signs with traffic signals and associated hazardous driving conditions. In addition, the Project would also comply with Section 131(c) of Title 23 of the USC, which prohibits the placement of advertising signs, displays, or devices within 660 feet from the right-of-way, visible from the main traveled way of the primary system, other than those advertising activities conducted on the property on which they are located, which may be changed at reasonable intervals by electronic process or by remote control. The Project would also be required to comply with

the California Outdoor Advertising Act. As set forth on pages IV.L-2 and IV.L-3 of Section IV.L. Traffic of the Draft EIR, the California Outdoor Advertising Act regulates outdoor advertising displays visible from California Highways by outlining qualitative criteria that aim to eliminate the potential for distractions through limiting the content and placement of signs. Provisions relevant to the Project include the following:

- Section 5403(e) of the CBPC prohibits the placement of signs displaying any red or blinking or intermittent light likely to be mistaken for a warning or danger signal in a location that is visible from a highway.
- Section 5403(h) of the CBPC prohibits the placement of signs displaying any flashing, intermittent, or moving light or lights in a location that is visible from a state regulated highway.
- Section 5405(d)(1) of the CBPC prohibits the placement of advertising displays within 660 feet from the edge of the right-of-way of any interstate or primary highway, other than message center displays that comply with all requirements of this chapter of the California Business & Professions Code. However, this section prohibits the message center displays to use flashing, intermittent, or moving lights, or message change that is in motion or appears to be in motion or that changes in intensity or exposes its message for less than four seconds. No message center display may be placed within 1,000 feet of another message center display on the same side of the highway. No message center display may be placed in violation of Section 131 of Title 23 of the USC (see above).
- Section 5408(b) of the CBPC prohibits the placement of the following in a business area: (1) illuminated signs in a manner that would interfere with the effectiveness of, or obscure any official traffic sign, device, or signal in a business area; (2) signs illuminated by flashing, intermittent, or moving lights (except that part necessary to give public service information such as time, date, temperature, weather, or similar information) in a business area; and (3) signs that cause beams or rays of light to be directed at the traveled ways if the light is of an intensity or brilliance as to cause glare or to impair the vision of any driver, or to interfere with any driver's operation of a motor vehicle.

The Draft EIR concludes that with implementation of Mitigation Measure IV.L-1 and compliance with these regulatory requirements, Project impacts associated with traffic hazards related to the proposed digital gallery would be less than significant. Also refer to pages IV.A-45 and IV.A-46 of Section IV.A. Aesthetics of the Draft EIR regarding the aesthetic and lighting impacts of the digital gallery that were determined to be less than significant.

These comments are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Planning Commission Special Meeting Comment No. 31

Chair Tim Wendler
Commissioner Patricia Keane
Commissioner Felicia Williams
Commissioner Michael Williamson
Commissioner Ali Barar
Commissioner Donald Nanney
Commissioner David Coher
Barbara Nanney (Public Speaker)
Maria Lopez (Public Speaker)
Nina Chomsky (Public Speaker)

Comment No. 31-1

Chair Wendler asked whether there is currently a conservation easement for the undeveloped portions of the Hillside Campus.

Response to Comment No. 31-1

While this comment does not address the content or adequacy of the Draft EIR, in response to the question, there is currently no conservation easement; however, according to ArtCenter, they have no intention or plans to develop the undisturbed portions of the Hillside Campus.

Comment No. 31-2

Commissioner Keane asked for more information about the CNG facility and if the Main Quad on the South Campus is a public space.

Response to Comment No. 31-2

While this comment does not address the adequacy of the Draft EIR, in response to the question, please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above. The Main Quad on the South Campus would be a publicly-accessible open space.

Comment No. 31-3

Commissioner Williams asked about the possibility of using electric shuttles instead of CNG-fueled shuttles.

Response to Comment No. 31-3

While this comment does not address the adequacy of the Draft EIR, in response to the question, ArtCenter indicated that they are waiting for the time when electric shuttles become more cost effective than CNG-fueled shuttles and that their ultimate goal is to use zero-emission vehicles.

Comment No. 31-4

Commissioner Williamson asked about the student housing affordability.

Response to Comment No. 31-4

While this comment does not address the content or adequacy of the Draft EIR, in response to the question, according to ArtCenter, on-site student housing will be provided below market rate in addition to taking into account the provision of on-site amenities and allowing students to be on-campus 24/7.

Comment No. 31-5

Commissioner Barar asked if there would be a direct connection to the Metro Gold Line and what agreements have been made with Metro.

Response to Comment No. 31-5

While this comment does not address the content or adequacy of the Draft EIR, in response to the question, according to ArtCenter, the shuttles will continue to make two stops between the two campuses—one at the Metro Gold Line Fillmore Station and the other at the Memorial Park Station to provide ArtCenter students and faculty a direct connection to the Metro Gold Line. ArtCenter’s land use counsel also indicated that the agreements between ArtCenter and Metro are currently being negotiated.

Comment No. 31-6

Commissioner Nanney asked if the Post Office Building is part of the South Campus and if the Wind Tunnel Building is historic and what are the current uses in it.

Response to Comment No. 31-6

While this comment does not address the content or adequacy of the Draft EIR, in response to the question, according to ArtCenter, the Post Office Building is the 870 Raymond Building and is part of the South Campus. The Wind Tunnel Building is not

a historic resource and is currently being used to house ArtCenter's graduate and undergraduate programs in media design and technology.

Comment No. 31-7

Barbara Nanney (Public Speaker) asked that ArtCenter consider rooftop gardens to contribute to its sustainability goals.

Response to Comment No. 31-7

While this comment does not address the adequacy of the Draft EIR, the commenter's request for consideration of rooftop gardens is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 31-8

Maria Lopez (Public Speaker) identified herself as a resident of the Fair Oaks community near the Hillside Campus and a concerned citizen regarding the placement of a CNG facility at the Hillside Campus. She asked that ArtCenter consider the CNG facility at the South Campus, not at the Hillside Campus.

Response to Comment No. 31-8

While this comment does not address the adequacy of the Draft EIR, in response to the question, please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 31-9

Commissioner Coher asked what the plan is for the CNG facility and for ArtCenter to consider an electric option if the timing coincides with the availability of feasible technology. He asked about the public space access rights and if the same agreements may be sought as the Kimpton Hotel facility.

Response to Comment No. 31-9

While this comment does not address the adequacy of the Draft EIR, in response to the question, please refer to Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above.

Comment No. 31-10

Commissioner Williams asked about the digital gallery and what amendments to the Zoning Code are required.

Response to Comment No. 31-10

As set forth on page III-20 of Section III, Project Description, of the Draft EIR, a Zoning Code Amendment is required for the digital gallery.

Comment No. 31-11

Commissioner Keane asked for more details about the digital gallery to ensure sufficient restrictions for the project feature to remain as a gallery and art space, not advertising, under the terms of the Development Agreement. She appreciates the presence of the mobility hub and expressed an opinion that electric vehicles may be a more viable option by the time the CNG facility is ready to be implemented. She asked how the CNG facility will be removed if shuttles are replaced with electric vehicles. She supports the Main Quad as an important feature that connects the campus and the student housing that would be provided by the Project.

Response to Comment No. 31-11

As set forth on page III-20 of Section III, Project Description, of the Draft EIR, a Zoning Code Amendment is required for the digital gallery.

While this comment does not address the adequacy of the Draft EIR, in response to the question, in the event ArtCenter replaces their shuttles with electric vehicles, the CNG fueling facility would be decommissioned in compliance with applicable regulations, including those established by the NFPA. Natural gas lines are connected and disconnected throughout the City and throughout the U.S. frequently as residences and businesses are developed or demolished. Removal of the CNG facility would undergo a similar process with stricter standards to ensure public safety during upset conditions.

The Commissioner's support of the Main Quad is noted for the administrative record.

Comment No. 31-12

Nina Chomsky (Public Speaker) introduced herself as the President of the Linda Vista-Annandale Association and noted that her comments are specifically related to the Hillside Campus only. She provided the following comments: (1) concerns regarding views of the solar panels from private backyards of hillside residences; she said the Association is

conducting its own study to determine which homes will have significant impacts related to views of the solar panels; (2) she stresses sustainability not only at the South Campus but at the Hillside Campus as well by preserving and planting more trees instead of the removal of hundreds of trees to accommodate the solar panels; (3) concerns regarding the CNG facility as a hazardous materials issue and a potential significant impact to an area identified as the highest fire danger area in California; she appreciates that ArtCenter listened to their comments about reducing vehicle trips to and from the Hillside Campus by providing shuttles but asked for the use of electric shuttles instead of CNG-fueled; (4) she mentioned a rumor that there is another proposal for development of the undisturbed portions of the Hillside Campus; she wants to see an official dedication of open space related to the undeveloped portions of the Hillside Campus.

Response to Comment No. 31-12

Please refer to the responses to the commenter's written comments included above as Comment Letter No. 8.

Comment No. 31-13

Commissioner Williams asked about the traffic and air quality impacts of having a CNG facility at the Hillside Campus—how the CNG will be transported to the Hillside Campus and the effects of the truck trips on air quality.

Response to Comment No. 31-13

While this comment does not address the adequacy of the Draft EIR, in response to the question, CNG would not be transported to the Hillside Campus by vehicle; instead, an existing natural gas line that already serves the Hillside Campus would be extended to the fueling station. Therefore, no traffic impacts would result from the installation of a CNG facility at the Hillside Campus or corresponding air pollutant emissions. With regard to air quality, as discussed in Topical Response No. 1: Compressed Natural Gas (CNG) Fueling Facility in Section III.B, Topical Responses, of this Final EIR above, natural gas is non-toxic and has no potential for ground or water contamination in the event of a fuel release. Natural gas is lighter than air and dissipates rapidly when released. Minimal release, if any, is anticipated during fueling of vehicles. As such, air quality impacts resulting from the installation of a CNG facility at the Hillside Campus would be negligible.

III. Responses to Comments

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See the City's Webpage for the [ArtCenter Master Plan](#) for the documents.