
**SUBSEQUENT MITIGATED NEGATIVE DECLARATION TO THE
ENVIRONMENTAL IMPACT REPORT FOR THE FULLER
THEOLOGICAL SEMINARY MASTER DEVELOPMENT PLAN**

STATE CLEARINGHOUSE No. 2005041163

DEVELOPMENT AGREEMENT No. 19378

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1. INTRODUCTION

As Lead Agency, the City of Pasadena prepared an Environmental Impact Report (herein referred to as the "2006 EIR") (State Clearinghouse No. 2005041163) for the Fuller Theological Seminary Master Development Plan (herein referred to as the "2006 Master Plan").¹ On November 20, 2006, the City of Pasadena City Council certified the 2006 EIR (Resolution No. 8676); adopted the corresponding Findings of Fact, Mitigation Monitoring and Reporting Program, and a Statement of Overriding Considerations for two impact areas (Air Quality and Cultural Resources) (Resolution No. 8677); adopted the 2006 Master Plan with conditions that corresponds to Alternative 5A: Modified Historic Preservation Alternative of the 2006 EIR; and approved the Development Agreement. City Council then adopted Ordinance No. 7095 on April 30, 2007 officially approving the Development Agreement. Since the Fuller Theological Seminary (Fuller) did not own all of the parcels within the 2006 Master Plan area at the time of certification of the 2006 EIR and approval of the 2006 Master Plan, the 2006 Master Plan identified an Interim Concept Plan and a Long Range Plan. The 2006 EIR analyzed the potential environmental impacts associated with the Long Range Plan, as it assumed maximum development based on buildout of the 2006 Master Plan.

The applicant has requested to amend the 2006 Master Plan and terminate the Development Agreement to better reflect existing operations, land ownership, and Fuller's redefined vision for future growth. The requested amendments to the 2006 Master Plan, or the proposed project, are herein referred to as the "2017 Master Plan." This Subsequent Mitigated Negative Declaration (MND) has been prepared to determine whether the 2017 Master Plan would result in new or substantially more severe significant environmental impacts when compared with the impacts disclosed in the 2006 EIR.

Discretionary approvals required for the 2017 Master Plan include a Master Plan Amendment and a Development Agreement Termination. According to Pasadena Municipal Code (PMC) Section 17.61.050.I.5.C, the City Council may approve, conditionally approve, or disapprove an application for an amendment to an adopted master plan. Further, the City's review of the 2017 Master Plan shall be limited to the scope of the application and shall not address reconsideration of aspects of the 2006 Master Plan, including conditions of approval that are not the subject of the application, except as these aspects may be affected by the 2017 Master Plan. Additionally, according to PMC Section 17.66.080.A.1, all parties to a development agreement may propose an amendment to, or cancellation in whole or in part of, any development agreement. All parties have agreed to the request to terminate the Development Agreement.

2. STATUTORY BACKGROUND

In accordance with the California Environmental Quality Act (CEQA), when a Lead Agency considers further discretionary approval on a previously approved project, the Lead Agency is required to consider if the previously certified CEQA document provides an adequate basis for rendering a decision on the proposed discretionary action. In summary, when making such a decision, the Lead Agency must consider any changes to the project or its circumstances that have occurred and any new information that has become available since the project's CEQA document was certified.

¹ The 2006 EIR and other referenced materials are available for review upon request at the City of Pasadena Planning and Community Development Department, 175 North Garfield Avenue, Pasadena, CA 91101 during normal City business hours.

In accordance with State CEQA Guidelines Sections 15162–15164, prior to approving further discretionary action, and depending on the situation, the Lead Agency must either: (1) prepare a Subsequent EIR; (2) prepare a Supplemental EIR; (3) prepare a Subsequent Negative Declaration; (4) prepare an Addendum to the EIR or Negative Declaration; or (5) prepare no further documentation. More specifically, State CEQA Guidelines Section 15162(a) states:

When an EIR [Environmental Impact Report] has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

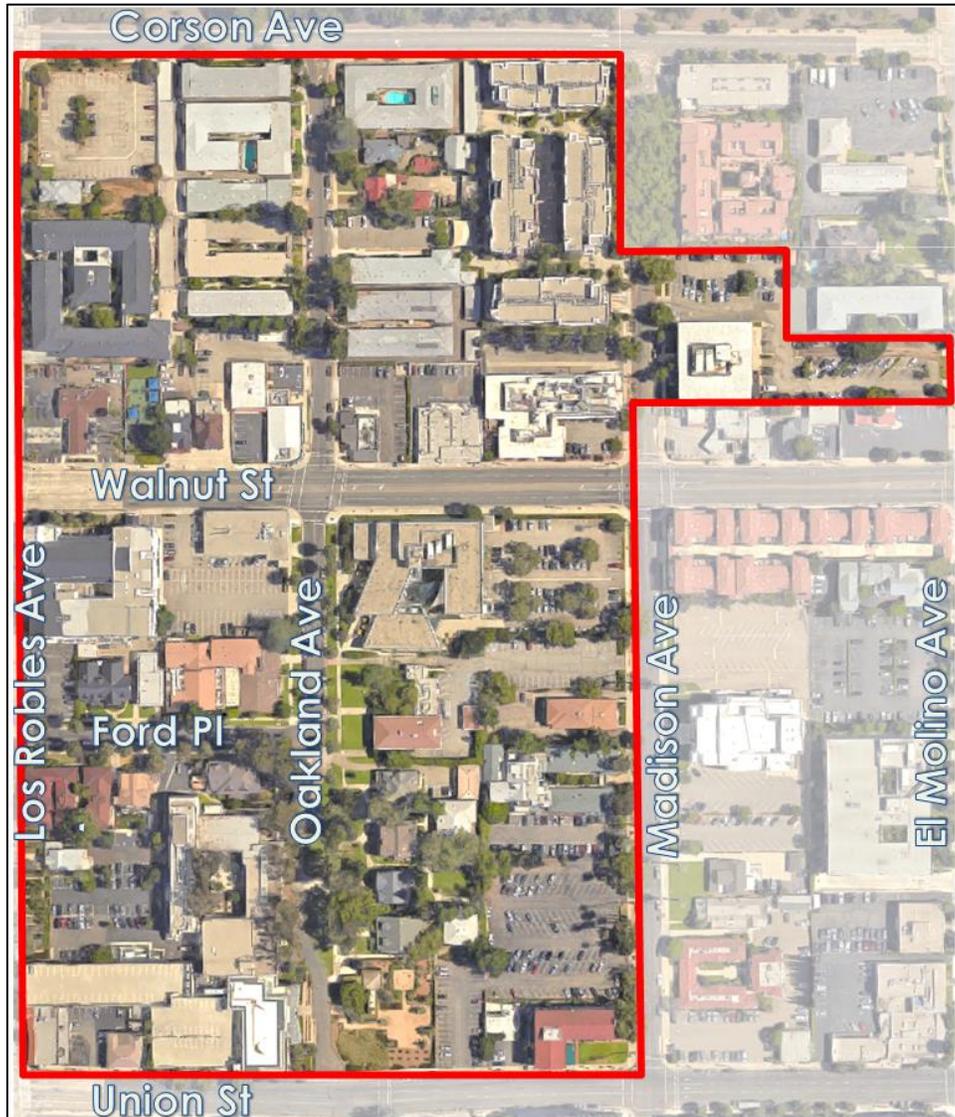
- (1) Substantial changes are proposed in the project which will require major revision of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As discussed below, none of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of subsequent Environmental Impact Report review have occurred. This Subsequent MND supports the conclusion that the proposed project modifications are minor and do not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, as discussed below, the proposed project modifications would not result in any new or substantially increased significant environmental impacts, and there is no new information of substantial importance, new mitigation measures, or new alternatives that would substantially reduce significant impacts. As a result, a Subsequent MND is an appropriate CEQA document for analysis and consideration of the proposed project modifications.

3. 2006 MASTER PLAN AREA

The 2006 Master Plan area, as shown in **Figure 1**, comprises approximately 25 acres in the Central District of the City of Pasadena (City), Los Angeles County, California. It is located approximately 2.4 miles east of the City of Glendale and approximately 9 miles northeast of downtown Los Angeles. The Master Plan area encompasses approximately four square blocks and is bound by E. Union Street to the south, N. Los Robles Avenue to the west, Corson Street to the north, and N. Madison Avenue to the east, with one parcel located east of N. Madison Avenue.

FIGURE 1 – 2006 MASTER PLAN AREA



4. PLANNING CONTEXT AND BACKGROUND

Fuller was established in 1947 and began construction of its Pasadena campus in 1953. Properties were acquired over the years as needed to serve Fuller's growing population. In 1983, Fuller first prepared a Master Plan to guide future growth. At that time, the City was developing an Urban Design Plan, which was the zoning document preceding the adoption of a major

updating of the Zoning Ordinance in 1985. Fuller requested to be excluded from the Urban Design Plan and to instead become part of an Institutional Zone with its own Master Plan. The City denied Fuller's request and recommended that Fuller pursue a Master Plan within the context of the Urban Design Plan. On November 1, 1983, the City Board of Directors (predecessor to the City Council) adopted the Urban Design Plan; and in 1985, the Urban Design Plan was incorporated into the Zoning Ordinance.

The Urban Design Plan had incorporated certain elements of the draft Master Plan that Fuller had developed into its regulations; so in 1992, the City adopted Resolution No. 6771, which affirmed that the City's adoption of the Urban Design Plan and Zoning Ordinance would include the incorporated elements of the draft Master Plan, intending to approve the "functionally equivalent" of a Master Plan for Fuller. As a result, Fuller operated under this functionally equivalent Master Plan going forward.

In the early 2000s, Fuller began considering the expansion of campus facilities in order to accommodate its anticipated growth. At that time, it anticipated a continued expansion of students, faculty, and properties. As such, the vision was to establish a traditional college campus rather than the collection of parts that had grown organically over the years of expansion and gradual property acquisitions. In 2004, Fuller submitted an application for a Master Plan for a 20-year planning framework to fulfill that goal. In 2006, Fuller also requested a Development Agreement to vest its development rights against any changes that might arise out of future General Plan and Zoning Code updates.

The Master Plan was adopted and a Development Agreement was approved by City Council on November 20, 2006. City Council adopted the 2006 EIR's Alternative 5A: Modified Historic Preservation Alternative for the 2006 Master Plan (see Cultural Resources Section below for details). As well, during City Council's consideration of the 2006 Master Plan, deliberations resulting from Planning Commission recommendations resulted in additional alterations to the project description from what was analyzed in the 2006 EIR (see Section 5 below for details).

In the decade since the 2006 approval, Fuller's vision for the campus has changed significantly, most notably in that growth has contracted instead of expanded, as was anticipated in 2006. This is reflected on the campus today, as the only completed development that was approved in the Master Plan is the library expansion and other minor projects such as parking lot changes, landscaping, and open space improvements. None of the other development identified and approved in the Master Plan, including new housing units, academic building additions, parking structure, or the chapel, has occurred.

The contraction in growth is in large part due to the launch of Fuller's online programs, enabling students to receive the same degrees without having to relocate to Pasadena. As well, Fuller has shifted the focus of its growth to other campuses in Arizona, Colorado, Washington, Texas, and other regions of California. Consequently, instead of continuing to expand, Fuller's Pasadena population has contracted to about 1,047 total students (about 854 campus students and about 193 partially online/on-campus students) from a total enrollment of 1,800 in 2006. As such, the need for Fuller to expand the physical facilities in Pasadena is no longer a part of the vision, as the future focus of the school is no longer a traditional college campus setting.

In July 2013, Fuller sold approximately 3.8 acres of land already developed with eight multifamily apartment buildings (197 units) that was envisioned for redevelopment in the 2006 Master Plan to include the addition of 244 net new affordable housing units for Fuller use. The existing 197 apartment units had been provided to Fuller students, staff, and faculty at a subsidized rate (at

about 10–20 percent below market). They have been vacant since approximately mid-year, 2015.

In March 2014, Fuller submitted an application to amend the 2006 Master Plan to exclude from the Master Plan area the 3.8 acres of property that was sold and to forfeit the previously intended development for those properties. However, that application was never deemed complete. In July 2015 the applicant requested to put the application on hold. Over the following year, Fuller worked on revising its incomplete application to provide a more comprehensive amendment request to better reflect its redefined vision for future growth. In April 2016, Fuller submitted revised materials reflecting this redefined vision. In May 2016, the amendment application was deemed complete. The 2016 application is the subject of this environmental analysis.

5. 2006 EIR AND MASTER PLAN

The City of Pasadena prepared the 2006 EIR (certified by the City Council on November 20, 2006) to analyze the potential environmental impacts that would result from the 2006 Master Plan and associated Development Agreement, described in Section 3 above. The 2006 EIR considered the construction of new academic, residential, and parking facilities and the extension of existing open space areas to create a unified network of open space within the Fuller campus. Ultimately, the City Council adopted Alternative 5A: Modified Historic Preservation Alternative of the 2006 EIR, as well as several other modifications, for the final 2006 Master Plan document (described below).

The 2006 EIR was prepared in conformance with CEQA (California Public Resources Code Section 21000 et seq.); CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.); and the rules, regulations, and procedures for implementation of CEQA, as adopted by the City. The purpose of the 2006 EIR was to review the existing conditions, analyze potential environmental impacts, and identify feasible mitigation measures to reduce potentially significant effects.

The Draft EIR for the 2006 Master Plan was distributed to responsible and trustee agencies, interested groups, and organizations. The Draft EIR (State Clearinghouse No. 2005041163) was made available for public review and comment for a period of 45 days; as established by the CEQA Guidelines, the public review period commenced on December 20, 2005, and ended February 21, 2006. The public was given the opportunity to provide comments on the Draft EIR at three public meetings: Transportation Advisory commission meeting on January 13, 2006; Historic Preservation Commission/Design Commission joint meeting on January 23, 2006; and the Planning Commission Meeting on January 23, 2006. As stated, the City Council certified the 2006 EIR on November 20, 2006, and adopted a Master Plan for the seminary that corresponds to Alternative 5A: Modified Historic Preservation Alternative, along with other changes as described above.

The 2006 EIR identified potential impacts that would result from the construction and operation of the project and provided measures to mitigate potential significant impacts. A Statement of Overriding Considerations was adopted for significant and unavoidable impacts for:

- Air Quality - Construction-related emissions
- Cultural Resources - Demolition of the Herkimer Arms Apartment House (unless relocated)

The 2006 EIR analyzed the Long Range Plan, as discussed in Section 1 above, which included four phases of development, including:

- Student enrollment capacity of up to 2,014 students
- Removal of 218 residential units in 20 buildings from the Master Plan area
- Demolition of 10 nonresidential buildings with approximately 39,000 square feet of area
- Acquisition of seven properties and removal of five residential buildings (26 units), one restaurant, and one industrial building from these properties
- Construction of approximately 22,400 square feet of retail space in mixed-use buildings
- Vacation of Oakland Avenue between Corson Avenue and Walnut Street for a new community green space requiring public right-of-way and property acquisitions

In addition to the above list, **Table 1** shows the components analyzed in the 2006 EIR that were revised by the City Council associated with Alternative 5A and other changes. The changes made by City Council resulted in a reduction of the project description analyzed in the 2006 EIR.

TABLE 1 – 2006 MASTER PLAN COMPONENTS MODIFIED BY CITY COUNCIL

2006 EIR As Analyzed	2006 Master Plan as Approved/Conditioned
Construction of 678 new campus housing units, 368 of which would be net new, for a total of 857 units at buildout	Construction of 514 new campus housing units, 304 of which would be net new, for a total of 797 units at buildout
Construction of 345,000 square feet of new academic facilities (including the library addition, chapel, and other academic development) for a total of 584,776 square feet at buildout	Construction of 300,000 square feet of new academic facilities (including the library addition, chapel, and other academic development) for a total of 482,000 square feet at buildout. The difference in existing floor area resulted from the relocation of the 182,000 square foot Herkimer Arms building.
Construction of a multiple-story 500 -space parking garage	Construction of a multiple-story 450 -space parking garage
Provision of 1,643 parking spaces on campus	Maximum of 1,353 parking spaces on campus

6. 2017 PROPOSED MASTER PLAN

On April 6, 2016, Fuller submitted a revised application for a Master Plan Amendment to reconfigure the 2006 Master Plan boundaries and to forfeit development rights for all development previously approved in 2006, except for a 50,000 square-foot addition to the existing library (completed in 2010) and the construction of a 35,000 square-foot chapel (see **Table 2**). This application was deemed complete. Thus, the only anticipated construction to occur within the 2017 Master Plan boundary is the chapel (i.e., only unbuilt development rights). There are no changes proposed to the chapel as described in the 2006 EIR.

The 2017 Master Plan also includes a decrease from the 2,014 student enrollment capacity approved in 2006 to 1,090 students, including 950 campus students, and 140 partially online/on-campus students (on campus one to two times a week for one quarter of the year). No new student housing units or parking spaces are proposed. Required parking will continue to be provided through on- and off-site parking, on Fuller-owned properties, as well as through lease agreements on non-Fuller-owned properties.

The Development Agreement between Fuller and the City is also proposed to be terminated. PMC Section 17.61.050.I.5.C allows changes of the Development Agreement, including termination, to occur with the agreement of all parties; and ultimately, the City Council is the decision-making body.

TABLE 2 – 2017 MASTER PLAN AMENDMENTS SUMMARY

Components	2006 Master Plan (at Buildout)	2017 Master Plan (at Buildout)
Master Plan area	± 25 acres	± 9.32 acres
Enrollment capacity	2,014 students	950 campus students* 140 partially online/on-campus students* **
Housing units	797 units maximum	189 units* ** *
Parking	1,353 spaces maximum	727 spaces (361 spaces within new Master Plan boundary and 366 spaces outside Master Plan boundary, but owned or leased by Fuller) ****
Construction plans	35,000 sq. ft. new chapel 50,000 sq. ft. library addition 215,000 sq. ft. of other new academic floor area Oakland Avenue open space	35,000 sq. ft. new chapel (future) 50,000 sq. ft. library addition (completed in 2010)
Development Agreement	Approved	Terminate

* Campus students = Take 50% or more of their units on campus

** Partially online/on-campus students = On campus one to two times a week for one quarter of the year.

*** The 2017 Master Plan also requires Fuller to house at least 30% of its eligible student body including master leases outside of Master Plan boundary.

**** Meet Zoning Code requirement for on Ford Place/Fuller Seminary classification, with annual reporting to Director.

DEVELOPMENT RIGHTS AND CAMPUS USES

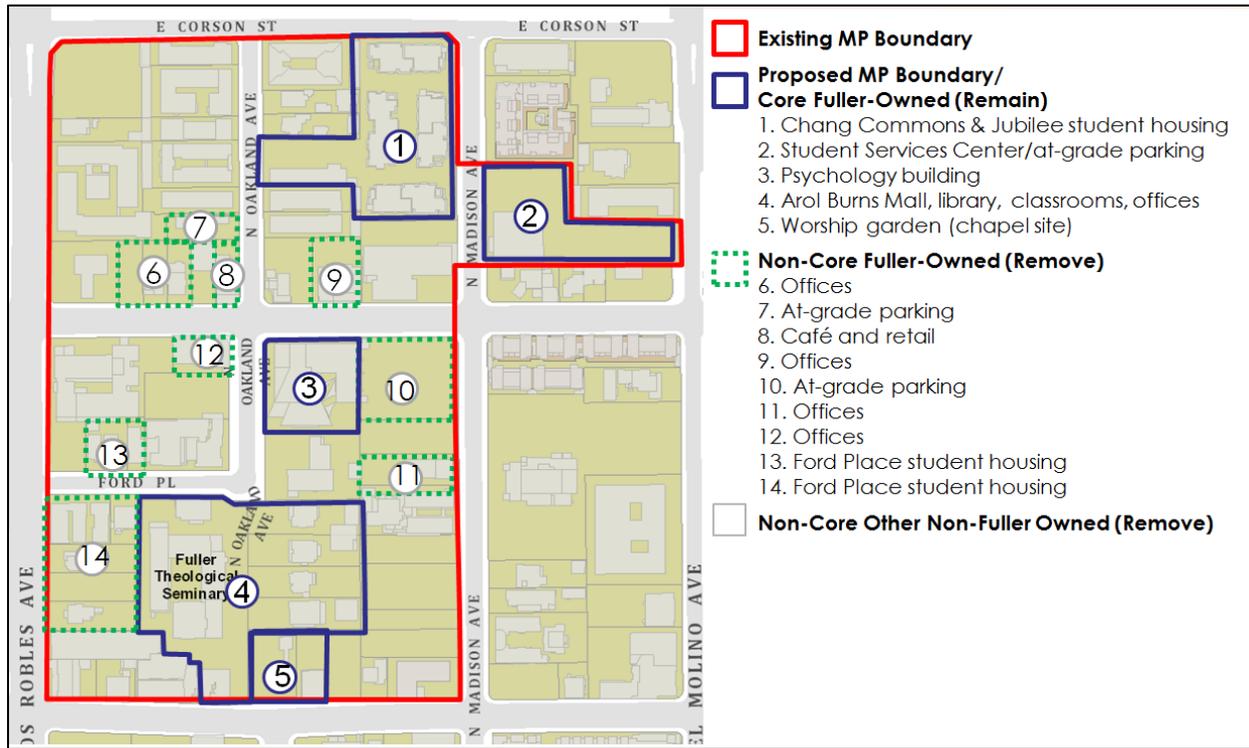
On the North Campus (north of Walnut Street), all future development approvals anticipated by the 2006 Master Plan would be forfeited, and existing development, including the Chang Commons 179-unit apartment complex, the Jubilee 10-unit apartment building, the student services center, and a surface parking lot, would remain. On the South Campus (south of Walnut Street), the 50,000-square-foot library addition (completed in 2010) would remain. Approval of the future development of the 35,000-square-foot, approximately 500-seat chapel would remain. All other development approvals in the 2006 Master Plan would be forfeited and all existing structures in the core properties would remain. The non-core properties, currently developed with a mix of offices, parking, housing, and a bookstore/café, would be removed from the Master Plan boundary.

2017 MASTER PLAN BOUNDARY

The 2017 Master Plan boundary would create a noncontiguous area focused on just the core properties owned by Fuller. **Figure 2** shows the existing and proposed Master Plan boundaries, as well as a breakdown of core properties, non-core properties, ownership, and development. The 2017 Master Plan area would be comprised of approximately 9.32 acres consisting of Chang Commons, located southwest of the Corson Street/N. Madison Avenue intersection; Student Services Center, located midblock east of N. Madison Avenue between Corson Street and E. Walnut Street; Psychology Building, located southeast of the E. Walnut Street/N. Oakland

Avenue intersection; and the campus center including the library, administrative buildings and classrooms, the cafeteria, Arol Burns open space, and future chapel site, located midblock north of E. Union Street.

FIGURE 2 – EXISTING AND PROPOSED MASTER PLAN BOUNDARIES AND CORE AND NON-CORE PROPERTIES



ZONING AND LAND USE DESIGNATIONS

The properties that would remain in the 2017 Master Plan boundary are designated as Institutional on the General Plan Land Use Diagram and are zoned CD-3. The parcels proposed to be removed from the 2017 Master Plan boundary are designated as Medium Mixed Use, 0.0–2.25 Floor Area Ratio on the General Plan Land Use Diagram and are zoned CD-3. If the 2017 Master Plan is approved, all parcels located outside of the 2017 Master Plan boundary would no longer be subject to requirements and regulations of the 2006 Master Plan. These properties would be subject to the provisions in the Pasadena General Plan, Central District Specific Plan, and Pasadena Zoning Code.

For an environmental analysis of buildout of the City in accordance with the General Plan, including buildout of the parcels proposed to be removed from the 2017 Master Plan boundary in accordance with the underlying Medium Mixed Use land use designation, see the City of Pasadena General Plan EIR certified on August 18, 2015 (State Clearinghouse Number 2013091009). As provided by CEQA Guidelines Section 15150 (Incorporation by Reference), the City of Pasadena General Plan EIR is incorporated herein by reference. The General Plan EIR and other referenced materials are available for review upon request at the City of Pasadena Planning and Community Development Department, 175 North Garfield Avenue, Pasadena, CA 91101 during normal City business hours, and are posted on the City's website (www.cityofpasadena.net/2015_Final_Documents).

EXISTING FULLER HOUSING

The 2017 Master Plan requires Fuller to provide subsidized housing for at least 30 percent of eligible student body, either on properties within the Fuller Master Plan area or on properties located outside of the Master Plan area, owned or master leased by Fuller. Fuller's existing housing stock consists of 283 units; with 216 units located on properties owned by Fuller and 67 units on properties not owned by Fuller provided through master leases. In total, 189 units (Chang Commons (179 units) and Jubilee (10 units)) would remain within the 2017 Master Plan boundary (see **Table 3/Figure 3**). All of the residential facilities leased by Fuller (Selah, Locust, Madison Square, and Orange Grove, which total 67 units) and Ford Place (27 units), owned by Fuller, would be outside of the 2017 Master Plan boundary. Section 7, Population and Housing, includes an in depth discussion on housing and the request amendments related to housing in the 2017 Master Plan.

TABLE 3/FIGURE 3 – EXISTING FULLER HOUSING STOCK

Housing Descriptions	Units
<i>Inside Amended MP boundary</i>	
<u>Fuller-Owned</u>	
Chang Commons (7-10)	179
Jubilee (6)	10
<i>Outside Amended MP Boundary</i>	
<u>Fuller-Owned</u>	
Ford Place (1-4)	27
<u>Master Leases</u>	
Selah (5)	20
Locust (not shown)	10
Madison Square IC (not shown)	16
Orange Grove (not shown)	21
Total	283

7. ENVIRONMENTAL ASSESSMENT

The 2017 Master Plan would result in a decrease in site area, development approvals, and enrollment capacity. This section provides a discussion of environmental factors potentially affected based on current information and the revised project description. The analysis presented herein provides a comparison of impacts between the 2006 Master Plan (as analyzed in the certified 2006 EIR) and the 2017 Master Plan.

AESTHETICS

The 2006 EIR states that the 2006 Master Plan was found to have a less than significant impact on the existing visual character of the site, scenic vistas and resources, and nighttime lighting.

The 2017 Master Plan proposes to reduce the Master Plan area by approximately 15.68 acres and forfeit all unbuilt development entitlements except for the chapel. Since the 2017 Master Plan would decrease the amount of land area and associated development potential, and since the development of the chapel was already considered as part of the 2006 Master Plan in the 2006 EIR, the 2017 Master Plan would result in similar or reduced impacts to those described

in the 2006 EIR pertaining to the existing visual character of the site, scenic vistas and resources, and nighttime lighting.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to aesthetics as a result of the 2017 Master Plan.

AGRICULTURAL RESOURCES

The 2006 EIR found that the project site does not contain any agricultural or forestry resources and is not zoned for agriculture or forestry. Since the 2017 Master Plan would occur within a portion of the project area that was assessed in the 2006 EIR, the 2017 Master Plan would continue to have no impact on agricultural or forestry resources.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to agricultural or forestry resources as a result of the 2017 Master Plan.

AIR QUALITY

As determined in the 2006 EIR, during project construction, the 2006 Master Plan would exceed the South Coast Air Quality Management District daily emissions thresholds for regional nitrogen oxide and reactive organic compound after implementation of all feasible mitigation measures (Mitigation Measures C-1 through C-15), and thus result in a significant and unavoidable impact on regional air quality. With regard to localized construction impacts, the 2006 Master Plan would have a less than significant impact on localized air quality with incorporation of mitigation measures during construction. Further, no notable impacts related to toxic air contaminants emissions during construction were anticipated to occur for the project and impacts were found to be less than significant.

During operations, the 2006 EIR determined that the project would not result in regional emissions that exceeded the South Coast Air Quality Management District significance thresholds and impacts would be less than significant for operation-phase pollutants. No significant impacts related to local carbon monoxide concentrations were found to occur for the project and the operation of the project was not anticipated to include any notable toxic air contaminants emission sources.

As stated, the 2017 Master Plan would result in an overall reduction in development as compared to the development anticipated by the 2006 Master Plan. Further, overall student enrollment capacity would be reduced. The only anticipated construction to occur within the 2017 Master Plan boundary is the chapel, and there are no proposed changes to the chapel details described in the 2006 EIR. Thus, impacts to air quality associated with construction and operation activities are expected to be less than what were identified in the 2006 EIR due to the overall decrease in project area and future development potential, and decrease in campus operations. Although 2006 EIR mitigation measure C-15 would not apply to the 2017 Master Plan, given there are no longer future construction plans for any residential buildings, all of the remaining mitigation measures, C-1 through C-14, would remain applicable to the 2017 Master Plan. Measure C-15 required air filtration systems for residential construction within 500 feet of Interstate 210.

Thus, the 2017 Master Plan would not result in an increase to air quality impacts previously identified in the 2006 EIR and no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to air quality as a result of the 2017 Master Plan.

Mitigation Measures

The 2006 EIR Mitigation Program includes measures to reduce potential impacts associated with the 2006 Master Plan to less than significant levels. The following measures from the 2006 EIR would also be applicable to the 2017 Master Plan.

- C-1: During all phases of construction, general contractors shall implement a fugitive dust control program pursuant to the provisions of South Coast Air Quality Management District Rule 403.
- C-2: During all phases of construction, general contractors shall maintain and operate construction equipment in accordance with manufacturer's specifications to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall turn their engines off when not in use to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during Stage II Smog Alerts or higher.
- C-3: During all phases of construction, general contractors shall water all excavated soil piles hourly or cover piles with temporary coverings. Additional unpaved construction areas shall be watered twice daily.
- C-4: In the event wind exceeds 25 miles per hour, all construction activities shall cease.
- C-5: On the last day of active operations prior to a weekend or holiday, general contractors shall apply water or a chemical stabilizer to maintain a stabilized surface. If chemical stabilizers are employed, only non-toxic soils stabilizers shall be used and shall be applied according to manufacturer's specifications.
- C-6: During all construction, general contractors shall post signs and monitor speed on unpaved roads to assure traveling speeds are reduced to no more than 15 miles an hour.
- C-7: During construction, contractors shall ensure that all truckloads of dirt hauled off-site have two feet of freeboard and shall be covered in the truck bed to prevent fugitive dust emissions en route to disposals site.
- C-8: During all phases of construction, contractors shall wash or brush off all construction equipment prior to leaving the construction site. The general contractor shall sweep or remove from the street all visible soil material that is inadvertently carried off the construction site.
- C-9: During construction, all contractors shall use electricity from power poles rather than temporary diesel- or gasoline-powered generators to the extent feasible.
- C-10: During construction, all contractors shall use alternative clean fuels, such as compressed natural gas-powered equipment instead of diesel-powered engines. The use of diesel-powered equipment shall be minimized by using gasoline-powered equipment to reduce nitrogen oxide emissions. If diesel equipment is used, particulate filters and low sulfur diesel fuel shall be used (i.e., diesel fuel with less than 15 ppm sulfur content), to the extent feasible.
- C-11: During construction activity on the project site, outdoor instructional activities for students shall be coordinated by the applicant to prevent undue exposure of students to active demolition and site grading activities.

C-12: During construction, deliveries of construction materials, hauling of exported soil, and other construction activities requiring access to the site by large vehicles shall be scheduled by the general contractor to take place during off-peak hours to the extent possible.

C-13: During construction, the use of high volume/low pressure paint spray systems, which spray at low velocities resulting in a higher transfer efficiency as compared to conventional pain spray systems, shall be used by the general contractor to minimize overspray to the extent feasible.

C-14: During construction, low volatile organic compounds paint, architectural coatings, and asphalt shall be utilized by the general contractor where possible.

GREENHOUSE GAS EMISSIONS

The Final Environmental Impact Report for the approved project was certified in 2006. Although this previous environmental document did not include a greenhouse gas (GHG) analysis, a supplemental environmental analysis of GHG impacts cannot be required absent new information on that topic.² Information on the effect of greenhouse gas emissions on the climate was known long before the City approved the 2006 EIR. Thus, the effect of greenhouse gas emissions on the climate could have been raised in 2006 when the City considered the Draft and Final EIR. Accordingly, the City finds that GHG impacts and climate change are not "new information" under Public Resources Code Section 21166. However, although not required for California Environmental Quality Act purposes, in the practice of providing information to decision makers and the public, the City conducted a GHG analysis, which is presented below for information purposes only.

The assessment of GHG emissions provided below is based on guidance from the South Coast Air Quality Management District (SCAQMD). On September 28, 2010, the SCAQMD recommended an interim³ screening level numeric bright-line threshold of 3,000 metric tons per year of carbon dioxide equivalent (CO₂e), and an efficiency-based threshold of 4.8 metric tons of CO₂e per service population (project residents plus patrons/vendors plus employees) per year. These thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. This working group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the California Governor's Office of Planning and Research (OPR), the California Air Resources Board, the Attorney General's Office, a variety of city and county planning departments in the South Coast Air Basin (Basin), various utilities such as sanitation and power companies throughout the Basin, industry groups, and environmental and professional organizations. SCAQMD thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners with regard to determining whether GHG emissions from a proposed project are significant.

For the purposes of disclosure, projected GHG emissions associated with proposed project operations are quantified and compared to the SCAQMD screening level threshold of 3,000 metric tons of carbon dioxide equivalents (CO₂e) annually. The California Emissions Estimator Model (CalEEMod) was used to quantify the GHG emissions that could result from construction

² Citizens for Responsible Equitable Environmental Development (CREED) v. City of San Diego, (2011) 196 Cal.App.4th 515, 531.

³ The SCAQMD has not announced when staff is expecting to present a finalized version of its GHG thresholds to the governing board.

and operation of build-out of the proposed Amended Master Plan. The anticipated GHG emissions associated with the project are shown in Table 4 and the project's CalEEMod modeling output files are included in Appendix A.

TABLE 4 – TOTAL PROJECT GREENHOUSE GAS EMISSIONS (ANNUAL) (METRIC TONS PER YEAR)

Emissions Source	Total CO₂e
Annual construction-related emissions amortized over 30 years	3
Area	0
Energy	333
Mobile	464
Waste	100
Water Usage	27
Total	927

As shown, the proposed project would not exceed the SCAQMD significance thresholds. Therefore, the project's contribution of GHG emissions would be less than significant.

BIOLOGICAL RESOURCES

The 2006 EIR determined that the Master Plan area is primarily disturbed and exists within a fully urbanized area. Further, the 2006 EIR found that compliance with the requirements of Pasadena's City Trees and Tree Protection Ordinance would ensure that all on-site trees are protected during construction and/or replaced. No riparian habitats or other sensitive natural community such as wetlands, sensitive plants, animals, or habitats exist on-site.

The 2017 Master Plan would not introduce any new areas potentially containing biological resources that were not already assessed in the 2006 EIR. The 2017 Master Plan would allow for decreased development and would not conflict with any local policies or ordinances relating to biological resources, and no habitat conservation plans, natural community conservation plans, or other approved plans apply to the site. Similar to the 2006 Master Plan, the 2017 Master Plan would be required to comply with Pasadena's City Trees and Tree Protection Ordinance.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to biological resources as a result of the 2017 Master Plan.

CULTURAL RESOURCES

The 2006 EIR identified significant historical resources within the 2006 Master Plan boundary, including the Herkimer Arms/Mrs. Parker Earle Apartment House, Professor William P. Hammond House, contributors to the Ford Place National Register Historic District, and certain campus landscape features. The adopted version of the Master Plan (Alternative 5A: Modified Historic Preservation Alternative in the 2006 EIR) resulted in less than significant impacts to Professor William P. Hammond House and campus landscape features after mitigation. However, the 2006 EIR identified significant and unavoidable impacts to the Herkimer Arms/Mrs. Parker Earle Apartment House, which would be removed from its current location and offered for relocation. The City adopted a Statement of Overriding Considerations for the 2006 Master Plan, and this relocation has already occurred. Additionally, the 2006 EIR concluded that impacts to

archaeological resources, paleontological resources, unique geologic features, and human remains would not occur, since the Master Plan area is heavily disturbed by human activities.

The 2017 Master Plan would not introduce any new areas that were not already assessed in the 2006 EIR. Thus, no new potentially historic buildings not previously considered in the 2006 EIR would be impacted. The 2017 Master Plan would forfeit all plans for demolition of the existing residential and academic facilities, including the historic buildings on campus. Therefore, the 2017 Master Plan would not significantly impact any historic buildings. The potential for future construction of a 35,000-square-foot chapel would continue to be allowed under the 2017 Master Plan and would be required to comply with 2006 EIR Mitigation Measure A-3. Implementation of this measure would mitigate impacts to the Ford Place National Register Historic District to a less than significant level through the incorporation of specific landscape design features around the library and chapel to accentuate historic preservation. Although the library has already been constructed, Mitigation Measure A-3 would be applicable to future development of the chapel in order to reduce potential impacts to the Ford Place National Register Historic District. Furthermore, while the remaining mitigation measures would not be applicable to the 2017 Master Plan, the historic resources on-site would continue to be subject to protection under CEQA and the City of Pasadena requirements for historic resources.

As stated, the 2017 Master Plan would not introduce any new areas that were not already assessed in the 2006 EIR. As such, potential impacts to archaeological resources, paleontological resources, unique geologic features, and human remains resulting from the 2017 Master Plan would be consistent with the impacts identified in the 2006 EIR.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to cultural resources as a result of the 2017 Master Plan.

Mitigation Measures

The 2006 EIR Mitigation Program includes measures to reduce potential impacts associated with the 2006 Master Plan to less than significant levels. The following measure from the 2006 EIR would be applicable to the 2017 Master Plan.

A-3: Chapel complex and library addition landscape plans shall incorporate the use of the mature Canary Island Date Palms which are a key feature of the potential Ford Place National Register Historic District. Landscape plans shall be developed and implemented that follow the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer. Any plans involving the removal or replacement of character-defining landscape elements for this project component shall be developed in conjunction with a qualified architectural historian, architect experienced in historic preservation, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 46 Code of Federal Regulations 61.

ENERGY

The 2006 EIR concluded that the 2006 Master Plan would not result in demand for new energy sources. The 2006 EIR also determined that the new loads from construction within the Master Plan area would be adequately fed from the existing high voltage feeders.

Given that the 2017 Master Plan would forfeit all unbuilt development entitlements except for the chapel, as well as reduce the overall student enrollment capacity, it can be anticipated that energy demands would be less than what were assessed in the 2006 EIR.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to energy as a result of the 2017 Master Plan.

GEOLOGY AND SOILS

The 2006 EIR found that on-site geologic conditions related to earthquake faulting, seismicity, erosion, soil instability, and expansive soils would be less than significant due to compliance with the Grading Ordinance and Seismic Standards of the California Uniform Building Code. Impacts related to seismic ground failure including liquefaction were found to be less than significant through the compliance of existing City regulations and the submittal of a soils report to the Building Division.

The 2017 Master Plan would reduce the project site to approximately 9.32 acres from the original 25 acres studied in the 2006 EIR. Further, the 2017 Master Plan would forfeit a majority of the future development anticipated under the 2006 Master Plan. Similar to the 2006 Master Plan, future development anticipated by the 2017 Master Plan would be required to comply with the City's current Grading Ordinance and seismic standards, including the preparation and submittal of soils reports, as required by the City, reducing potential impacts associated with geology and soils conditions to a less than significant level.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to geology and soils as a result of the 2017 Master Plan.

HAZARDS AND HAZARDOUS MATERIALS

The 2006 EIR stated that the 2006 Master Plan would not include uses that involved the transport, use, or disposal of hazardous substances, other than common cleaning supplies. The 2006 EIR also found that Master Plan area is not located on the State of California Hazardous Waste and Substances Sites List published by the California Environmental Protection Agency, nor is it located within an airport land use plan or within 2 miles of a public airport or public use airport, or the vicinity of a private airstrip.

The 2017 Master Plan would not introduce any new areas or activities that would potentially involve a hazardous waste site or the transport, use, or disposal of hazardous substances not previously considered in the 2006 EIR. The 2017 Master Plan would allow for decreased development and student enrollment capacity, resulting in an overall reduction in activities at the site. Therefore, the 2017 Master Plan would result in similar or reduced impacts to those described in the 2006 EIR pertaining to the transport, use, or disposal of hazardous substances.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to hazards and hazardous materials as a result of the 2017 Master Plan.

HYDROLOGY AND WATER QUALITY

The 2006 EIR found that the 2006 Master Plan was anticipated to result in less than significant impacts related to water quality standards, wastewater discharge requirements, and existing drainage patterns of the site upon adherence to the City's National Pollution Discharge Elimination System permits and the City's Standard Urban Storm Water Management Plan requirements. Additionally, the 2006 EIR found that the 2006 Master Plan would have no impact on stormwater drainage systems or groundwater. The 2006 EIR also found that Fuller Theological Seminary was not located within a Federal Emergency Management Agency identified 100-year flood hazard area or an area identified as being an area prone to flood damage. As such, the 2006 Master Plan was not found to expose people or structures to a significant risk of loss,

injury, or death involving inundation by a seiche or tsunami or involving flooding as a result of the failure of a levee or dam.

The 2017 Master Plan would not introduce any new areas that were not already assessed in the 2006 EIR. The 2017 Master Plan would reduce the Master Plan area to approximately 9.32 acres, compared to 25 acres under the 2006 Master Plan. Further, the 2017 Master Plan would allow for decreased development, resulting in an overall reduction in the amount of land area subject to potential drainage modifications. The 2017 Master Plan would allow for development of a new chapel, which was considered as part of the 2006 Master Plan. Therefore, the 2017 Master Plan would result in impacts substantially similar to or less than those described in the 2006 EIR.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to hydrology and water quality as a result of the 2017 Master Plan.

LAND USE AND PLANNING

The 2006 EIR found that the 2006 Master Plan would not result in the division of an established community due to the developed nature of the project site and surrounding area. Additionally, the 2006 EIR found that the 2006 Master Plan would have no impact to any applicable habitat conservation plan or natural community conservation plan as there are no such plans in the City of Pasadena.

The 2017 Master Plan would decrease the project area and forfeit all future construction plans, except for the completed 50,000-square-foot library addition and the future development of a 35,000-square-foot chapel. The 2017 Master Plan would not result in the division of an established community and, similar to the 2006 Master Plan, impacts would remain less than significant. All parcels located outside of the 2017 Master Plan boundary would no longer be subject to regulation by the Master Plan; however, they would continue to be subject to provisions in the General Plan, Central District Specific Plan, and Zoning Code (including the underlying CD-3 zoning). As such, the 2017 Master Plan would be equally consistent with the City's General Plan goals and policies as the 2006 Master Plan. As discussed above, the 2017 Master Plan would be required to comply with the City of Pasadena's City Trees and Tree Protection Ordinance and Historic Preservation Ordinance. As such, the 2017 Master Plan would result in a less than significant land use impact related to consistency with applicable land use plans, policies, or regulations adopted for the purpose of avoiding and mitigating an environmental effect.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to land use and planning as a result of 2017 Master Plan.

MINERAL RESOURCES

The 2006 EIR concluded that the 2006 Master Plan would not result in the loss of availability of a known mineral resource or the loss of a locally important mineral resource recovery site. Since the 2017 Master Plan would occur within a portion of the project area that was assessed in the 2006 EIR, the 2017 Master Plan would continue to have no impact on mineral resources.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to mineral resources as a result of the 2017 Master Plan.

NOISE

The 2006 EIR found that, upon compliance with the City's Noise Ordinance, impacts to noise standards and sensitive receptors would be less than significant. Additionally, the 2006 EIR found

that there would be no impacts to permanent ambient noise levels or temporary ambient noise levels. The Fuller Theological Seminary was also identified as not being within an airport land use plan or within the vicinity of a private airstrip; thus, the project was not found to have an impact on the exposure of people to excessive noise levels.

The 2017 Master Plan would reduce the project site to approximately 9.32 acres from the original 25 acres and forfeit a majority of the future development anticipated under the 2006 Master Plan. These revisions would result in less demolition, site preparation, construction, and project operation activities than those identified in the 2006 EIR. Given enrollment capacity would be reduced, the 2017 Master Plan would also result in fewer daily trips along the city's roadway network, resulting in reduced traffic noise levels when compared to the 2006 Master Plan. The number of on-site uses, including parking and housing units, would also decrease, thus creating a reduced level of noise generated by the Fuller campus. The 2017 Master Plan would still be required to comply with the City's Noise Restrictions Ordinance (PMC Chapter 9.36). As a result, noise impacts from the 2017 Master Plan would be less than significant, as identified in the 2006 EIR.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to noise as a result of the 2017 Master Plan.

POPULATION AND HOUSING

The 2006 EIR stated that the proposed project would provide for an enrollment capacity of 2,014 students and result in the construction of approximately 678 new units, for a total of 857 units at buildout. As previously discussed in Section 6, the City Council ultimately adopted a slightly lower residential buildout with 304 net new units, for a total of 797 units at buildout. The 2006 EIR determined that indirect and direct impacts to population growth and employment would be less than significant. Additionally, impacts to displacement of people and existing housing were found to be less than significant due to the expected growth at the time of on-campus student population and corresponding residential units.

On-campus population has declined since preparation of the 2006 EIR. In response to this decline, the 2017 Master Plan proposes to reduce the maximum student enrollment allowed and the approved development entitlements analyzed in the 2006 EIR. Student enrollment capacity would be reduced from 2,014 students to 950 campus students (students who take 50 percent or more of their units on campus), and 140 partially online students (students who are on campus one to two times a week for one quarter of the year) for a total of 1,090 students. With the decline in student enrollment and capacity, the 2017 Master Plan forfeits all residential development entitlements.

The 2017 Master Plan requires Fuller to provide subsidized housing for at least 30 percent of the eligible student body. Currently, to be eligible for Fuller housing, a student must meet certain criteria such as being an accepted Fuller student, registering for at least 24 units of masters-level or 16 units of doctoral-level course work within an academic year, and being cleared by the International Services Office for international students. As such, at certain times the number of eligible students may be less than the number of total campus students.

At full enrollment, assuming that all campus students are eligible, 30 percent would equate to 285 students. Fuller's existing student-to-unit housing ratio is about 1.25, which is in large part due to the fact that existing units range in size from studios to four bedrooms. Assuming a similar rate going forward, at maximum enrollment, the number of units that would be necessary to offer housing to at least 30 percent of the eligible student body would be 228 units, assuming that all campus students are eligible.

Fuller currently owns, or controls through a master lease, 283 residential units (see **Table 2**). At this point in time, Fuller does not anticipate reducing the total number of units; however, the requirement to provide housing to at least 30 percent of the eligible student body is based on a percentage of students and not a fixed amount of units.

In the case that Fuller does reduce the total number of units due to reductions in student enrollment, but then experiences an increase in student enrollment that would necessitate increasing the unit count, Fuller must correspondingly provide the necessary units. They may do so through lease agreement(s) with, or purchase of, other existing residential properties in the area. Fuller would lease such market rate properties and sublet the units to its students at a subsidized rate. Construction of new residential units would not be permitted under the 2017 Master Plan, unless the necessary permits and/or approvals are processed and received from the City.

The 2017 Master Plan would not cause any significant environmental impacts related to population and housing, as it would not induce substantial population growth. Conversely, the 2017 Master Plan would reduce Fuller's on-campus enrollment capacity from 2,014 to 1,090 students (950 campus and 140 partially online/on-campus). With the reduction in enrollment capacity, the 2017 Master Plan would not result in the need to construct replacement housing elsewhere. While the maximum enrollment capacity would be greater than Fuller's current enrollment of approximately 1,047 students (about 854 full-time campus students and about 193 partially online/on-campus students), the daily on-campus student population would be substantially similar to the existing condition. With the reduction in enrollment capacity, the declining need for campus housing, the ability to satisfy the 2017 Master Plan housing requirement with existing housing stock, and the available housing stock in Pasadena and surrounding communities, the 2017 Master Plan would not result in the need to construct replacement housing elsewhere.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to population and housing as a result of the 2017 Master Plan.

PUBLIC SERVICES

The 2006 EIR concluded that the 2006 Master Plan would have no impacts related to libraries and that impacts related to fire protection, police protection, schools, and other public facilities would be less than significant.

The 2006 EIR also found that impacts to parks would be less than significant due to the Oakland Avenue open space plan, which involved vacating a portion of Oakland Avenue and creating a landscaped open space that would be accessible to the public. The Central District Specific Plan allows for additional floor area, beyond what the base zoning allows, to be approved by the Planning Commission if public amenities and public outdoor space are provided. The 2006 Master Plan included the Oakland Avenue open space in response to the opportunity for additional floor area. Due to the refined focus to no longer be a full-service campus, and the need for extra floor area no longer being necessary, the 2017 Master Plan also proposes to forfeit the plan for an Oakland Avenue open space. As such, impacts related to parks would remain less than significant.

The 2017 Master Plan proposes to reduce the Master Plan area in response to the decrease in on-campus population. The parcels requested to remain in the 2017 Master Plan area would have the same size/layout and the same amenities and uses as previously analyzed in the 2006 EIR. As such, none of the requested amendments would result in the need for increased public services or facilities in comparison to the 2006 Master Plan.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to public services as a result of the 2017 Master Plan.

RECREATION

The 2006 EIR found that impacts to the construction, expansion, and use of recreational facilities would be less than significant due to the provision of additional open spaces and recreational facilities.

As discussed above, the 2017 Master Plan proposes to forfeit the Oakland Avenue open space plan, which would have created additional publicly accessible space on Fuller's campus. Moreover, the 2017 Master Plan also proposes to reduce the Master Plan area and construction plans significantly in order to accommodate the current status and decrease in demand of the campus. The student capacity would decrease from the existing enrollment of approximately 1,047 students to a maximum capacity of 950 campus students, which is less than half of the currently allowed capacity of 2,014 students. Although the 950 students could still utilize neighborhood and regional parks, such park usage would be less than the usage of the existing student body (approximately 1,047 students). Therefore, implementation of the 2017 Master Plan would not result in substantial physical deterioration of any recreational facilities and would have less than significant impacts.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to recreation as a result of the 2017 Master Plan.

TRANSPORTATION/TRAFFIC

The 2006 EIR found that the 2006 Master Plan would have no impacts to air traffic patterns or emergency access to nearby uses. Additionally, the 2006 EIR concluded that impacts to parking capacity would be less than significant and alternative transportation would be less than significant upon compliance with the City's Transportation Demand Management Program. The 2006 EIR identified potentially significant impacts to intersection operations (the intersections of Los Robles Avenue and Walnut Street, and Madison Avenue and Walnut Street), street segment volumes (four segments along Corson Street and Walnut Street), and on-street parking in the vicinity of the Master Plan area. As such, mitigation measures were identified to reduce traffic impacts to a less than significant level.

The 2017 Master Plan is requesting physical adjustments and revisions to the Master Plan boundaries, and the forfeiture of future construction plans of any new residential units and 215,000 square feet of new academic buildings. The 2017 Master Plan would be required to comply with adopted policies, plans, or programs supporting alternative transportation. Additionally, the 2017 Master Plan would be required to prepare a Construction Staging and Traffic Management Plan to ensure construction traffic would result in less than significant impacts.

The 2017 Master Plan would result in less development and a reduced student enrollment capacity when compared to the 2006 Master Plan. Since the traffic volumes generated in the 2006 EIR assumed larger student enrollment and a resultant level of staff, it can be expected that traffic volumes would be less with the 2017 Master Plan. Because the 2017 Master Plan would not include the development of academic or residential buildings, Mitigation Measures B-1 through B-7 would no longer apply to the 2017 Master Plan. Further, Mitigation Measure B-8 has been implemented will the installation of traffic signals at the Union/Oakland intersection.

In 2014, after the adoption of the 2006 Master Plan, the City of Pasadena adopted new transportation analysis metrics. These metrics remove the traditional level of service and street segment analyses from CEQA documents and require such documents to analyze vehicle miles traveled, vehicle trips, proximity to quality transit and bicycle facilities, and the quality of the pedestrian environment. The City's new transportation analysis metrics includes CEQA significance thresholds for each of these categories. The City Transportation Impact Analysis Current Practice and Guidelines manual (dated September 25, 2015) identifies that residential projects less than 50 units and nonresidential projects less than 50,000 square feet in size are "below communitywide significance" and do not require analysis for transportation impacts pursuant to CEQA. The only anticipated construction to occur within the 2017 Master Plan boundary is the 35,000-square-foot chapel (i.e., the only unbuilt development rights that would remain). Since the 2017 Master Plan would not add more than 50,000 square feet of nonresidential space or more than 50 residential units, transportation impacts are considered less than significant.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to transportation and traffic as a result of the 2017 Master Plan.

UTILITIES AND SERVICE SYSTEMS

The Storm Drain and Sewer Flow Analysis in the 2006 EIR determined that impacts to new water or wastewater treatment facilities would be less than significant due to availability of water by the Water Division of the City's Water and Power Department. Impacts to groundwater withdrawal were also found to be less than significant upon compliance with the Water Shortage Procedures Ordinance. The analysis also found that impacts to solid waste would be less than significant and impacts from surface runoff would be less than significant upon compliance with the City's Standard Urban Stormwater Management Plan. Lastly, the analysis states that Mitigation Measure D-1 would reduce the Master Plan's impacts on the wastewater infrastructure system to a less than significant level by requiring sewer line enhancements prior to the second phase of residential construction on the campus.

Given the reduced development potential and student enrollment capacity of the 2017 Master Plan, impacts to water supplies, wastewater collection and treatment, and solid waste disposal needs would remain less than significant. Mitigation Measure D-1 would not apply to the 2017 Master Plan, given there are no longer future construction plans for any residential buildings. Impacts with regard to stormwater drainage facilities would remain less than significant. The 2017 Master Plan would be required to comply with PMC Chapter 8.62 (Construction and Demolition Ordinance), the City's Standard Urban Storm Water Management Plan requirements, and the City's National Pollution Discharge Elimination System permits.

Thus, no new potentially significant impacts or substantial increase in the severity of impacts would occur with regard to utilities and service systems as a result of the 2017 Master Plan.

MANDATORY FINDINGS OF SIGNIFICANCE

Based on the impact comparison provided above, the revised project would not result in new potentially significant impacts or a substantial increase in the severity of impacts under CEQA. Thus, in comparison to the analysis provided in the 2006 EIR, the 2017 Master Plan would not:

1. Result in increased impacts related to degradation of the environment or impacts to biological or cultural resources.
2. Result in increased cumulative impacts.

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3. Result in increased substantial adverse effects on human beings, either directly or indirectly.

8. CONCLUSION

In accordance with State CEQA Guidelines Sections 15162–15164, prior to approving further discretionary action and depending on the situation, the Lead Agency must either: (1) prepare a Subsequent EIR; (2) prepare a Supplemental EIR; (3) prepare a Subsequent Negative Declaration; (4) prepare an Addendum to the EIR or Negative Declaration; or (5) prepare no further documentation.

On the basis of the evaluation contained in this document, the City of Pasadena finds that there are no proposed changes to the project description, changes in the circumstances under which the project is being undertaken, or any new information of substantial importance that was not known to the Lead Agency at the time the previous Environmental Impact Report was certified that trigger any of the conditions identified in Public Resources Code Section 21166 or State CEQA Guidelines Section 15162 which would require the preparation of a subsequent Environmental Impact Report. Therefore, this Subsequent MND has been prepared to document the changes and additions to the 2006 EIR for the 2017 Master Plan to explain the Lead Agency's decision not to prepare a subsequent EIR.

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