VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, and in the Initial Study, which is included in Appendix A, of this Draft EIR, implementation of the Project would not result in significant and unavoidable impacts. All Project impacts are either less than significant or less than significant with mitigation.

2. Significant Irreversible Environmental Changes

In accordance with Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment

of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

Solid waste generation during construction and operation of the Project is addressed in Section IV.M.3, Utilities and Service Systems—Solid Waste, of this Draft EIR. Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

During construction of the Project, a construction waste management plan would be implemented to recycle and/or salvage a minimum of 75 percent of non-hazardous construction debris in accordance with Chapter 8.62, the Construction and Demolition Waste Management Ordinance, of the Pasadena Municipal Code (PMC). Thus, the consumption of non-renewable building materials, such as lumber, aggregate materials, and plastics, would be reduced.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption of the Project at buildout. In addition, the Project falls within the available and projected water supplies for normal, single-dry and multiple-dry years through the year 2040, and the Pasadena Water and Power (PWP) would be able to meet the water demand for the Project in addition to the existing and planned water demands of its future service area. Furthermore, the Project would comply with PWP's water conservation measures and restrictions on wasteful water use, as detailed in Chapter 13.10 of the PMC. Thus, as evaluated in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project operation would result in the irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption and Air Quality

During on-going operation of the Project, non-renewable fossil fuels would represent the primary energy source, and, thus, the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.M.4, Utilities and Service System—Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. As the consumption of fossil fuels would occur on a temporary basis during construction, impacts related to the construction consumption of fossil fuels would be less than significant.

The Project's increase in electricity and natural gas demand during Project operation would be within the anticipated service capabilities of PWP and the Southern California Gas Company, respectively. As discussed in Section IV.M.4, Utilities and Service Systems—Energy, of this Draft EIR, the Project would be designed and constructed in accordance with state and local green building standards that would serve to reduce the energy demand of the Project. Specifically, the Project would comply with the City's Green Building Standards. In addition, as discussed in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project would incorporate Project Design Feature F-1 to not include the installation of natural gas fireplaces within student housing units. To further offset electricity consumption, the Project will also install photovoltaic (PV) solar cells and canopies at the North and South lots on the Hillside Campus and on the roof of the 988 Building on the South Campus. With regard to transportation fuel, the Project would minimize petroleum-based fuel consumption through the reduction of VMT by providing on-campus student housing, increasing the frequency of ArtCenter shuttles, providing bicycle-serving amenities, and improving pedestrian accessibility through Project design. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans or violate state or federal energy standards. Please refer to Section IV.M.4, Utilities and Service Systems—Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Conclusion

Based on the above, Project construction and operation would require the irretrievable commitment of finite, slowly renewable, and non-renewable resources, which would limit the availability of these resources for future generations or for other uses. However, the consumption of such resources would not be considered substantial and

would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant. Considering that the Project would consume an immaterial amount of natural resources and result in improvements to an existing urban use primarily on an infill site at the South Campus, the limited use of non-renewable resources is justified.

3. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced or fostered as follows:

- Direct growth associated with a project;
- Indirect growth created by either the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

While the Project includes new on-campus housing, this use is typically not considered residential development for purposes of local or regional growth projections. At Project buildout, the Project would result in 500 additional full-time equivalent (FTE) students and approximately 1,500 on-campus residents in the proposed student housing buildings. Many of the students, who may choose to live on campus, may already live in the City of Pasadena. However, even conservatively assuming all of the new students may move from outside the City, this increase in population would be within regional growth projections.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Accordingly, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project, and, therefore, no new permanent residents are anticipated as a result of Project construction.

Regarding operation of the Project, the proposed academic uses would include a limited number of full-time and part-time positions. However, the overall increase of 241 faculty/staff members on campus would be within regional growth projections. As such, it is unlikely that the Project would create an indirect demand for additional housing or households in the area. Typically, the jobs associated with maintenance and operation of the new facilities would be filled to some extent by employees already residing in the vicinity of the Project Site. However, it is also possible that some of these jobs would be filled by persons moving into the surrounding area, and housing demand associated with the Project could increase. Nevertheless, it is anticipated that some of this demand would be filled by existing vacancies in the housing market and some from other new units in nearby developments. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees, who may relocate their place of residence, would not be substantial. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Pasadena. Furthermore, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, it would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population growth. Therefore, impacts related to population growth would be less than significant.

4. Potential Secondary Effects

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a

result of the implementation of the proposed mitigation measures, for those environmental issue areas where mitigation is proposed.

a. Biological Resources

Mitigation Measures C-1 through C-11 pertain to reducing impacts on special status plant and wildlife species, other wildlife species, and sensitive natural communities, and wetland habitat. These mitigation measures are procedural actions to ensure the protection of sensitive biological resources and would not result in physical secondary impacts beyond those already identified in Section IV.C, Biological Resources, of this Draft EIR, during Project construction (i.e., installation of BMPs, such as silt fencing).

b. Cultural and Tribal Cultural Resources

Mitigation Measures D-1 and D-2 pertain to reducing impacts related to the unanticipated discovery of archaeological resources and tribal cultural resources. Implementation of these mitigation measures would be beneficial in reducing impacts to cultural resources and would ensure compliance with applicable regulations related to unanticipated discoveries. No adverse secondary impacts would occur as a result of implementation of these mitigation measures.

c. Hazards and Hazardous Materials

Mitigation Measure G-1 pertains to reducing potential impacts related to hazardous materials or hazardous emissions during ground disturbance at the 988 Parcel. This mitigation measure is a procedural action to ensure protection of construction workers and the public in the event that environmental conditions, such as soil contamination, are encountered during excavation and other ground-disturbing activities at the 988 Parcel. No adverse secondary impacts would occur as a result of implementation of this mitigation measure.

d. Hydrology and Water Quality

Mitigation Measure H-1 pertains to reducing potential impacts related to mudflows at the Hillside Campus. This mitigation measure addresses the design of the proposed expansion of the South Building, including the new Commuter Services and Facilities Hub, to ensure that the new expanded facility would not be exposed to the potential effects of mudflows. No adverse secondary impacts would occur as a result of implementation of the mitigation measure beyond those already identified in Section IV.C, Biological Resources, of this Draft EIR, during Project construction (e.g., potential encroachment into areas with sensitive biological resources).

e. Noise

Mitigation Measures J-1 through J-3 pertain to reducing impacts related to construction noise and vibration. Mitigation Measure J-1 involves erecting sound barriers to reduce construction noise levels at sensitive receptor locations. No adverse secondary impacts would occur as a result of implementation of this mitigation measure beyond those already identified in each of the environmental topics included Section IV, Environmental Impact Analysis, of this Draft EIR, during Project construction. Mitigation Measures J-2 and J-3 are procedural actions to ensure that no physical impacts occur related to off-site impacts during nighttime construction and to the existing building structure located immediately adjacent to the north of the proposed location of the 1101 Building. No adverse secondary impacts would occur as a result of implementation of these mitigation measures.

f. Traffic

Mitigation Measure L-1 pertains to reducing the impact related to traffic hazards due to a design feature, specifically the proposed digital gallery. Mitigation Measure L-1 involves modifications to the design of the digital gallery, which has been fully considered in this Draft EIR. The modifications identified in Mitigation Measure L-1 would not result in physical impacts beyond those already identified in Section IV.L, Traffic, of this Draft EIR.

5. Effects Not Found To Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. The Initial Study for the Project, included as Appendix A of this Draft EIR, determined that several impacts were not found to be significant within the issue areas of aesthetics (as related to scenic resources); agricultural and forestry resources; air quality (as related to objectionable odors); biological resources (as related to tree resources and habitat conservation plans); cultural resources (as related to paleontological resources); energy (as related to energy conservation plans); geology and soils (as related to soil erosion or loss of topsoil and soil support for alternative wastewater disposal systems); hazards and hazardous materials (as related to airport land use plans; private airstrips; emergency response and evacuation plans; and wildland fires); hydrology and water quality (as related to flood hazard areas; levee or dam failures); land use and planning (as related to the physical division of an established community and habitat or natural community conservation plans); mineral resources; noise (as related to airport land use plans and private airstrips); population and housing (as related to substantial population growth and displacement of housing and people); public services (as related to libraries, parks, police protection, schools, and other

public facilities); recreation (as related to deterioration of parks and recreation facilities); and transportation/traffic (as related to air traffic patterns and inadequate emergency access). Refer to the Initial Study in Appendix A for detailed explanations as to why these effects were not found to be significant.