

VIII. ENVIRONMENTAL MITIGATION MONITORING AND REPORTING PROGRAM FOR COLORADO AT LAKE PROJECT

A. AUTHORITY

Section 21081.6 of the California Public Resources Code requires that public agencies approving a project with an Environmental Impact Report (EIR) adopt a Mitigation Monitoring and Reporting Program (MMRP) for that project. The purpose of the MMRP is to ensure that the mitigation measures identified in the EIR to mitigate the potentially significant environmental effects of the project are, in fact, properly carried out. In its findings concerning the environmental effects of a project for which an EIR was prepared, a Lead Agency must also include a finding that a MMRP has been prepared and provides a satisfactory program that would ensure avoidance or sufficient reduction of the significant effects of the proposed project. This report will be kept on file in the offices of the City of Pasadena Planning Department, 175 North Garfield Avenue, Pasadena, CA 91101.

B. MONITORING SCHEDULE

Monitoring of the implementation of adopted mitigation measures is required by Public Resources Code Section 21081.6. Therefore, this MMRP has been prepared to ensure compliance with all of the mitigation measures identified in the Final EIR which would lessen or avoid potentially significant adverse environmental impacts resulting from implementation of the proposed project. Prior to the issuance of building permits, while detailed development plans are being prepared for approval by City staff, City staff will be responsible for ensuring compliance with mitigation monitoring applicable to the project design phase. City staff will prepare or cause to be prepared reports identifying compliance with mitigation measures. Once construction has begun and is underway, monitoring of the mitigation measures associated with construction will be included in the responsibilities of designated City staff, who shall prepare or cause to be prepared reports of such monitoring of no less than once a month until construction has been completed. Once construction has been completed, the City will monitor the project as appropriate and provided in the monitoring plan.

C. FORMAT OF MITIGATION MONITORING MATRIX

The mitigation monitoring matrix on the following pages is formatted to parallel the format of the Executive Summary table contained in the Final EIR. The matrix identifies the environmental issue areas for which monitoring is required, the required mitigation measures, the time frame for monitoring, and the responsible monitoring agencies.

If any mitigation measures are not being implemented, the City may pursue corrective action. Penalties that may be applied include, but are not limited to, the following: (1) a written notification and request for compliance, (2) withholding of permits, (3) administrative fines, (4) a stop work order, (5) criminal prosecution and/or administrative fines, (6) forfeiture of security bonds or other guarantees, and (7) revocation of permits or other entitlements.

**TABLE VIII-1
Colorado at Lake Mitigation Monitoring and Reporting Program Matrix**

Impact	Mitigation Measure	Responsible Implementation Party/Monitor and Reporter	Time Frame/ Monitoring Milestone	Responsible to Review Reports
Aesthetics				
<i>Lighting and Illumination</i>				
The proposed project would result in new sources of increased light and glare from new lighting systems. This is considered a potentially significant impact.	IV.A-1 All lighting along the perimeter of the site, particularly street lamps, shall be focused on the project site and oriented in a manner that will prevent spillage or glare into surrounding uses. Lighting shall be energy-efficient and shielded so that direct glare and reflections are confined to the maximum extent feasible within the building site, and shall be directed downward and away from adjoining properties and public rights-of-way. All proposed exterior (safety, landscape and signage) lighting shall comply with the outdoor lighting standards in the City of Pasadena Zoning Code.	Applicant's Lighting Engineer	At design review and plan check; field inspection and confirmation prior to final building approval	Planning Department—Code Compliance
	IV.A-2 The proposed project shall comply with the City's lighting regulations included in the Zoning Code, which limit the reflectivity of architectural materials used to reduce any adverse impacts from window glass glare.	Applicant's Lighting Engineer	At design review and plan check	Planning Department—Code Compliance
	IV.A-3 Construction equipment staging areas shall use and maintain appropriate screening (i.e., temporary fencing with opaque material) to buffer views of construction equipment and material to the adjacent land uses. Any construction-related lighting shall include shielding in order to direct lighting down and away from adjacent residential and commercial areas.	Applicant's Mitigation Monitor; Applicant's General Contractor	At design review and plan check; field inspection	Planning Department—Code Compliance and Public Works Department
Air Quality				
VOC concentrations would exceed the SCAQMD regional thresholds during Phase 3 of the proposed project, and, as such, would result in a significant and unavoidable regional impact during project construction. Additionally, daily construction emissions for PM _{2.5} and PM ₁₀	IV.B-1 The construction area and all accessible areas (public streets, sidewalks, etc.) within 100 feet of the project site shall be swept (preferably with water sweepers) and watered at least twice daily. IV.B-2 The construction contractor shall utilize at least one of the following measures at each vehicle egress from the project site to a paved public	Applicant's Mitigation Monitor; Applicant's General Contractor	Prior to issuance of grading permits; daily monitoring during construction; weekly reporting during construction	Public Works Department

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<p>would exceed the SCAQMD localized significance threshold during each project phase and, as such, would result in a significant and unavoidable localized impact during project construction. Even with implementation of SCAQMD Rule 403, impacts would still exceed localized thresholds.</p>	<p>road:</p> <ul style="list-style-type: none"> • Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; • Pave the surface extending at least 100 feet and at least 20 feet wide; • Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or • Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. <p>IV.B-3 Site access points shall be swept/washed within thirty minutes of visible dirt deposition. Street sweepers that comply with SCAQMD Rule 1186 and 1186.1 shall be used to sweep site access points or reclaimed water shall be used to wash site access.</p> <p>IV.B-4 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).</p> <p>IV.B-5 Construction activity on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.</p> <p>IV.B-6 Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.</p> <p>IV.B-7 Ground cover in disturbed areas shall be replaced as quickly as possible.</p> <p>IV.B-8 The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter).</p>			

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	<p>IV.B-9 The construction contractor shall utilize materials that do not require painting, as feasible.</p> <p>IV.B-10 The construction contractor shall use pre-painted construction materials, as feasible.</p> <p>IV.B-11 All diesel-powered construction equipment in use shall require control equipment that meets Tier III emissions requirements. In the event Tier III equipment is not available, diesel powered construction equipment in use shall require emissions control equipment with a minimum of Tier II diesel standards.</p> <p>IV.B-12 The construction contractor shall utilize electricity from power poles rather than temporary gasoline or diesel power generators.</p>			
Historical Resources				
<p>The project would result in adverse affects to the Constance Hotel property (specifically, the demolition of the related Colorado Boulevard storefronts) such that it will no longer convey its historic significance. Implementation of mitigation measures would not reduce impacts to historic resources to a less-than-significant level and the Constance Hotel would likely not continue to remain eligible for the California Register of Historical Resources and the National Register of Historic Places. Consequently, the project as currently proposed, would have a significant and unmitigated impact to historical resources, even with preservation of the former Constance hotel tower and related elements including the hotel courtyard.</p>	<p>IV.C-1 The Constance Hotel and related buildings shall be photographed according to HABS standards for photography prior to any demolition, abatement or rehabilitation work. Views shall include all exterior elevations for each building, important interior features, key spatial relationships among buildings, and exterior hardscape features. These photos will also serve as graphic documentation for the Historic Structures Report described in mitigation measure IV.D-2. The negatives and archival quality prints will be donated to the Pasadena Public Library.</p> <p>IV.C-2 A Historic Structures Report (HSR) shall be prepared which will include all the original components of the Constance Hotel property (hotel tower, courtyard, one-story retail building, and garage). The HSR will provide documentary, graphic, and physical information about both the property's history and its existing condition including a reproduction of the hotel's original drawings. Measured drawings of as-found conditions are not required. The report will also</p>	<p>Applicant's Independent Historic Preservation Consultant</p>	<p>Prior to issuance of grading permit</p>	<p>Planning Department— Design & Historic Preservation</p>

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	<p>salvaged intact, using such expertise and care as is necessary for intact removal without loss and damage, are (a) glazed ceramic tiles at the fountain pool and glazed ceramic tile panels on the concrete walls, and (b) flagstone pavers. In addition to the HABS photographs that shall be provided, the courtyard shall be documented by measured drawings of the floor plan and north, east, south, and west elevations to HABS standards prior to demolition. The reconstructed courtyard shall match the demolished courtyard in size, shape, form, material, and finish, as documented by the HABS photographs and measured drawings. The features that shall be replicated accurately include the footprint of the walls, planters, and fountain, and materials such as the board-formed poured-in-place concrete walls. The only aspect that may vary in the replicated courtyard is the finished elevation of the flagstone pavers, which will be raised to accommodate the parking structure below and matching the elevation to the interior first floor level to accommodate wheelchair users without the need to add a ramp and railing at the loggia such as occurred at the existing incompatible addition.</p> <p>V.C-6 There are potential construction impacts that are mitigated to a less than significant level by monitoring by a qualified professional. These impacts are demolition of buildings and landscaping, shoring, excavation, new buildings below and above grade near and attached to historic resources on the site. A structural engineer with qualifications in completed historic preservation projects that conform to the Secretary of the Interior's Standards for Rehabilitation will be consulted and provide monitoring and written review of the engineering and construction of work that is on site and contiguous with historic resources that are to</p>	Applicant's Independent Historic Preservation Consultant; structural engineer	Daily monitoring during construction; weekly reporting during construction	Planning Department— Design & Historic Preservation, Code Compliance and Public Works Department

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	<p>remain to ensure that the work being done is consistent with the Standards. If the engineer concludes that the work being done is not consistent with the Standards, the engineer shall give immediate verbal notice to the owner and contractor, followed by written notice of non-conformance. If there is no satisfactory response within one calendar week, then the engineer shall notice the City's mitigation monitor immediately, verbally, followed in writing and the City shall take any action as may be necessary to halt the work until such consistency is re-established.</p> <p>IV.C-7 A historic preservation professional with qualifications in completed historic preservation project that conform to the Secretary of the Interior's Standards for Rehabilitation will be consulted and provide monitoring and written review of the work that is related to historic preservation to ensure that the work being done is consistent with the Standards. If the historic preservation professional concludes that the work being done is not consistent with the Standards, they shall give immediate verbal notice to the owner and contractor, followed by written notice of non-conformance. If there is no satisfactory response within one calendar week, then the historic preservation professional shall notice the City's mitigation monitor immediately, verbally, followed in writing and the City shall take any action as may be necessary to halt the work until such consistency is re-established. This professional shall meet the Secretary of the Interior's professional qualifications standards for a historic architect.</p> <p>IV.C-8 Using materials gathered for mitigation measures IV.C-1 and 2, an interpretive program including photographic exhibits and written descriptions shall be developed to chronicle the history of the site, original configurations, architects,</p>	<p>Applicant's Independent Historic Preservation Consultant</p> <p>Applicant's Independent Historic Preservation Consultant</p>	<p>Daily monitoring during construction; weekly reporting during construction</p> <p>Prior to issuance of occupancy permit</p>	<p>Planning Department— Design & Historic Preservation, Code Compliance</p> <p>Planning Department— Design & Historic Preservation</p>

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	<p>cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within one-quarter mile of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.</p> <p>IV.D-3 The construction contractor shall utilize caisson drilling instead of pile driving on the project site.</p>	Applicant's Construction Contractor	Prior to issuance of grading permit; monthly during construction period	Department of Public Works
<i>Construction Vibration</i>				
<p>Based on federal guidelines, the project could result in a vibration impact if the project would expose buildings to vibration levels of 0.5 inches per second, or would expose historic buildings to vibration levels of 0.12 inches per second. Mitigation including caisson drilling and recordation/repair of any potential vibration damage would reduce impacts to less than significant.</p>	<p>IV.D-4 Prior to commencement of construction activity, a qualified structural engineer shall survey the existing foundation and other structural aspects of the former Hotel Constance and 45 N. Mentor Avenue (subject to property owner granting access to conduct the survey). The survey shall provide a shoring design to protect the identified land uses from potential damage. Pot holing or other destructive testing of the below grade conditions may be necessary to establish baseline conditions and prepare the shoring design. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have a minimum of ten years specific experience rehabilitating historic buildings and applying the Secretary's Standards to such projects.</p> <p>IV.D-5 The qualified structural engineer shall submit a pre-construction survey letter establishing baseline conditions at the former Hotel Constance and the buildings located adjacent and to the south of the project site. These baseline conditions shall be forwarded to the lead agency and to the mitigation monitor prior to issuance of any foundation only or building</p>	<p>Applicant's structural engineer</p> <p>Applicant's Structural Engineer</p>	<p>Prior to commencement of construction</p> <p>Prior to commencement of construction</p>	<p>Department of Public Works; Planning and Development Department— Design & Historic Preservation</p> <p>Department of Public Works; Planning and Development Department— Design & Historic Preservation</p>

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	<p>permit for the proposed project.</p> <p>IV.D-6 At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to the former Hotel Constance and the buildings located adjacent and to the south of the project site. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs to the former Hotel Constance shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24) prior to issuance of any temporary or permanent certificate of occupancy for the new building.</p>	Applicant's Structural Engineer	Upon completion of vibration causing activities	Department of Public Works; Planning and Development Department— Design & Historic Preservation
Transportation and Circulation				
	<p>All phases of the project are subject to the City's Transportation Demand Management (TDM) Trip Reduction Ordinance (TRO) requirements. The purpose of the trip reduction requirement is to reduce the demand for automobile commute trips by ensuring that the design of major nonresidential developments projects accommodates facilities for alternative modes of transportation. A TDM plan shall be completed to address the project's programs to promote alternative modes of transportation prior to the issuance of the first permit for construction per phase (foundation, demolition, grading, or building) and shall meet the following requirements:</p> <p>1. <i>Carpool and Vanpool Parking.</i> A minimum of 10% of the employee parking spaces shall be reserved for and designated as preferential parking for carpool and vanpool vehicles. Such parking area shall be in a location more convenient to the place of employment than parking spaces for single occupant vehicles, and shall be located as close as practical to the employees' entrances.</p>	Applicant	Prior to issuance of occupancy permit	Department of Transportation

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	<p>2. <i>Bicycle Parking.</i> Bicycle parking shall be provided on-site in compliance with Section 17.46.320 (Bicycle Parking Standards). In addition, the bicycle parking shall be located near the employee entrance and shall be conveniently accessible from the external circulation system.</p> <p><i>Transportation Demand Management Program Plan.</i> A Transportation Demand Management Program ("TDM") Plan shall be submitted which complies with Chapter 10.64 of the Municipal Code (Transportation Management Program). The owner/ developer shall place a deposit with the Department of Transportation prior to the issuance of the first permit for construction (foundation, demolition, grading, or building) per phase. This deposit is subject to a partial refund or additional billing in the event that the deposit amount is not sufficient to cover the cost of the review. The developer shall pay an annual Transportation Demand Management (TDM) status report review fee in compliance with the requirements of the Trip Reduction Ordinance.</p>			
<i>Phase 1 - Intersections</i>				
No significant intersection impacts would occur.	No mitigation measures related to intersection operations would be required for Phase 1 of the proposed project. However, all phases of the project are subject to the City's Transportation Demand Management (TDM)/Trip Reduction Ordinance (TRO) requirements.	Applicant	Prior to issuance of occupancy permit	Department of Transportation
<i>Phase 1- Street Segments</i>				
Phase 1 segment impacts would exceed the City's 7.4% increase significance threshold along two street segments (i.e., Mentor Avenue between Union Street and Colorado Boulevard and Mentor Avenue between Green Street and Cordova Street), with provision of off-site valet parking.	IV.E-1 The proposed project shall contribute funds to the Neighborhood Traffic Management Capital Improvement Program Fund Number 75210. The funds will be used to implement traffic management measures to protect neighborhoods potentially influenced by the project's traffic. This mitigation measure is in line with the objectives of the street segment thresholds to protect	Applicant	Prior to issuance of building permit	Department of Transportation

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	<p>residential neighborhoods from intrusion of traffic intended to and from commercial projects. Section 4.1.3.1 of the Mobility Element of the General Plan states: "The Council established, as City policy, that traffic growth would be limited on selected streets in order to protect residential neighborhoods."</p> <p>IV.E-2 All of the sidewalks, crosswalks and travel lanes along Mentor Avenue and Colorado Boulevard shall be made available such that pedestrian and vehicular access and circulation within and in the vicinity of the project site would be maintained at all times during Phase 1 construction activities.</p>	Applicant	Prior to issuance of grading permit; monthly during construction period	Department of Transportation; Department of Public Works
<i>Phase 1 - Access and Circulation</i>				
Mitigation is required to ensure valet operations and on-site services function without conflict.	<p>IV.E-3 The functional adequacy of the valet operations on-site shall be demonstrated to the Pasadena Department of Transportation at the time of final design and permits for the Phase 1 component of the proposed project to ensure there will be no conflicts with on-site services. Continued operational adequacy of the valet operations during Phase 2 construction shall also be demonstrated to Pasadena DOT.</p>	Applicant	Prior to issuance of building permits	Department of Transportation
<i>Phase 1 - Parking</i>				
Although an adequate number of parking spaces would be available at 2 N. Lake Avenue to satisfy Phase 1 parking needs, the mitigation is required to ensure the formal agreement to allow for off-site parking is in place, prior to proceeding with the project.	<p>IV.E-4 A formal recorded parking agreement between the applicant and the off-site parking provider shall be submitted to the City's Planning Department and Department of Transportation prior to the issuance of the first permit for construction (foundation, demolition, grading, or building). The parking agreement shall indicate the number of parking spaces to be leased to the applicant, and any time constraints to access those parking spaces, if any.</p>	Applicant	Prior to issuance of grading permits	Planning Department; Department of Transportation

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	Ordinance (TRO) requirements.			
<i>Phase 2 – Street Segments</i>				
Phase 1 segment impacts would exceed the City's 7.4% increase significance threshold along one street segment (i.e., Mentor between Green Street and Cordova Street.	Refer to Mitigation Measure IV.E-1 above.	Applicant	Prior to issuance of building permit	Department of Transportation
<i>Phase 2 – Access and Circulation</i>				
Mitigation is required to ensure functional adequacy of driveways and loading spaces with development of a portion of total subterranean parking.	<p>IV.E-9 The configuration of the Mentor Avenue driveway shall be coordinated with the City of Pasadena DOT before Final design approval. Specifically, the Mentor Avenue driveway shall be designed to provide unimpeded vehicular access at all times. At a minimum, DOT recommends three unrestricted lanes to serve vehicular traffic to and from Mentor Avenue. Appropriate overhead signage and striping shall be installed to reduce on-site driver confusion and decision-making.</p> <p>IV.E-10 The functional adequacy of the loading spaces shall be demonstrated to the satisfaction of the Pasadena Department of Transportation at the time of final design and permits for Phase 2 conditions to ensure there will be no conflicts with on-site services.</p>	Applicant	Prior to issuance of building permit	Department of Transportation
<i>Phase 2 - Construction</i>				
The effect of Phase 2 construction traffic would be less than significant, but mitigation is required to ensure that appropriate construction controls are in place.	Refer to Mitigation Measures IV.E-5 through IV.E-8 above.	Applicant	Prior to issuance of grading permits; monthly during construction period	Department of Public Works; Department of Transportation

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<i>Phase 3 - Intersections</i>				
The intersection of Lake Avenue/Walnut Street would be significantly impacted during the evening peak hour by the combined traffic effects of the overall proposed project, Phases 1, 2 and 3 combined.	<p>IV.E-11 <i>Lake Avenue/Walnut Street</i> – The proposed project shall compensate for the acquisition of a shuttle bus as well as for the operations and maintenance (O&M) costs for the new shuttle bus service to be operated along Lake Avenue and/or the Walnut Street travel corridors at minimum for the first three years. The final route selection would be determined by the transit shuttle operator. Additionally, the unsubsidized portion of the O & M costs for this shuttle service for an additional seven years shall be considered. This Project transit improvement will recognize, consider, and build upon the recommendations from Pasadena ARTS Bus or any other bus operator for implementation of this improvement.</p> <p>IV.E-12 <i>Transit Incentives</i> – The proposed project shall provide subsidized transit passes at specific locations, conveniently located on-site. All eligible employees, residents and hotel guests shall be offered discounted daily or monthly transit passes giving them access to all transit services operating in the area.</p>	Applicant	Prior to issuance of first construction permits	Planning Department—Code Compliance and Department of Transportation
<i>Phase 3 – Street Segments</i>				
During Phase 3, three street segments (i.e., Mentor Avenue between Walnut Street and Union Street, Mentor Avenue between Union Street and Colorado Boulevard and Mentor Avenue between Green Street and Cordova Street) would exceed the City's 7.4% increase threshold.	Refer to Mitigation Measure IV.E-1 above.	Applicant	Prior to issuance of building permit	Department of Transportation

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<i>Phase 3 – Transit</i>				
The project would have a less than significant impact on the regional transit system, but would impact the bus zone at lake Avenue/Colorado Boulevard, warranting mitigation.	<p>IV.E-13 For the bus zone at the southeast corner of the Lake Avenue/ Colorado Boulevard intersection, the following conditions shall apply:</p> <ul style="list-style-type: none"> • The applicant shall provide funds for a new bench, solar trash container, and bus stop signage; • Bus zone shall be a minimum of 130 feet wide at this very heavily used transit stop location. • No new trees shall be located within the bus zone to prevent interference with ADA guidelines, boarding/alighting, and other pedestrian accessibility. • The existing bus shelter shall be retained in the zone at all times. • Existing transit operations of the transit stop shall be maintained during and after construction at all times. 	Applicant	Prior to issuance of building permit; monthly during construction period	Department of Transportation
<i>Phase 3 – Access and Circulation</i>				
Mitigation is required to ensure that driveway designs, valet service area and operations and loading functionality are effectively coordinated with the City.	<p>IV.E-14 The driveway designs, valet service area and operations and loading area functionality shall be coordinated with the City of Pasadena DOT at the time of final design.</p> <p>IV.E-15 Truck and vehicular turn templates should be laid out on the site plan once design details have been worked out to ensure that on-site congestion is minimized to the satisfaction of Pasadena DOT at the time of final design approval.</p>	Applicant	Prior to issuance of grading permit	Department of Transportation
<i>Phase 3 - Construction</i>				
The effect of Phase 3 construction traffic would be less than significant, but	Refer to Mitigation Measures IV.E-5 through IV.E-8 above.	Applicant	Prior to issuance of grading permits;	Department of Public Works and

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mitigation is required to maintain key elements of the transportation infrastructure in an operable manner and to minimize construction impacts.			monthly during construction period	Department of Transportation
Utilities				
<i>Wastewater and Service Systems</i>				
Adequate capacity is available at regional treatment facilities. However, some improvements in local infrastructure might be needed to connect the project.	<p>IV.F.1-1 At the time of construction design documents and if determined by the Department of Public Works, the applicant shall install one new 6-inch sewer lateral in Mentor Avenue or Lake Avenue, to Department of Public Works specifications. Since the lateral is not allowed to be larger than 6-inches, there is no ability to install a larger lateral in anticipation of future development.</p> <p>IV.F.1-2 The City of Pasadena Department of Public Works shall approve all plans for the proposed installations prior to issuance of any building permit and all improvements shall be provided to the satisfaction of the City Engineer prior to issuance of Certificates of Occupancy.</p> <p>IV.F.1-3 If so directed by the City of Pasadena Department of Public Works at the time a connection request is made, sewer loading for the proposed project shall be directed away from the Lake Avenue sewer system, which has relatively less available capacity, to the Colorado Boulevard or Mentor Avenue sewer systems to the satisfaction of the City Engineer.</p>	Applicant	At design review and plan check	Department of Public Works
<i>Water Supply Systems</i>				
Adequate regional water supply is available to serve the project within existing entitlements. Existing local facilities are also available to serve the project. However, mitigation is warranted to further ensure that water consumption	IV.F.2-1 Consistent with LEED New Construction and Major Renovations, Water Efficiency Credit 3.1, the project shall employ strategies that in aggregate use 20% less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy	Applicant	At design review and plan check	Department of Public Works

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is sufficiently conserved.	<p>Policy Act of 1992 fixture performance requirements. Calculations are based on estimated occupant usage and shall include only the following fixtures (as applicable to the building): water closets, urinals, lavatory faucets, showers and kitchen sinks.</p> <ul style="list-style-type: none"> • Implementation of fixtures that meet or exceed those fixtures listed in LEED NC V3.0 Credit Number 3 in the table titled "Commercial and Residential Fixtures". • Renovation of the existing hotel will include replacement of toilets with high efficiency toilets and replacement of shower heads with low flow shower heads and faucets. • Restrooms in the proposed residential units will include high efficiency toilets as well as low flow shower heads and faucets. • Restrooms in the proposed office and retail areas will include waterless urinals, high efficiency toilets and low flow faucets. • The project will install drought-resistant landscaping and an automated irrigation system. • Hotel linen services will not be provided on-site. 			